

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: **03-17409**

A. Source Description

This permit is for the modification of 2 screen printing lines and the installation of 2 screen washers which emit organic compounds (OC).

B. Facility Emissions and Attainment Status

The facility has requested synthetic minor limitations to avoid Title V applicability. The emissions of OCs from Screen Printing Line, Clean Room Line #3 (K004) and emissions of OC's from Screen Printing Line, Clean Room #2 (K005) shall not exceed 63 tons per year combined based on a rolling, 12-month summation of monthly emissions. The federally enforceable OC limitations are based on OC material usage and content restrictions.

The facility has also requested that the 2 screen washers be included in a previously requested and issued synthetic minor limit of 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, & K006 combined.

American Trim LLC PC4 is located in Auglaize County which is in attainment for all pollutants.

C. Source Emissions

Federally enforceable OC limitations based on OC material usage restrictions and a maximum coating VOC content of 3.5 pounds per gallon of coating (calculated as volume weighted average) excluding water and exempt solvents per year included in this permit will result in a limitation of 63 tons of OC per year from emissions unit K004 & K005 combined.

American Trim, LLC PC4 has also requested federally enforceable limitations to restrict the potential to emit of HAPs to 9.5 tons per year for any individual HAP and 24 tons per year from any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined.

D. Conclusion

The rolling, 12-month summation of the monthly emissions, OC material usage and content restrictions along with limiting HAP emissions below major source thresholds, the facility will not be applicable to the Title V program or MACT requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
AUGLAIZE COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 03-17409

Fac ID: 0306020025

DATE: 5/20/2008

American Trim LLC
Michael Wittman
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 for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** 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.

Sincerely,

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 **03-17409** FOR AN AIR CONTAMINANT SOURCE

FOR **American Trim LLC**

On 5/20/2008 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 03-17409:

Administrative modification of PTI 03-10257 to allow for change in rule applicability and establish federally enforceable emission limitations. Also, addition of screen washers.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-17409

Application Number: 03-17409
Facility ID: 0306020025
Permit Fee: **To be entered upon final issuance**
Name of Facility: American Trim LLC
Person to Contact: Michael Wittman
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 proposed emissions unit(s):

Administrative modification of PTI 03-10257 to allow for change in rule applicability and establish federally enforceable emission limitations. Also, addition of screen washers.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

American Trim LLC
PTI Application: 03-17409
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0306020025

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

American Trim LLC**Facility ID: 0306020025****PTI Application: 03-17409****Issued: To be entered upon final issuance**

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

American Trim LLC**Facility ID: 0306020025****PTI Application: 03-17409****Issued: To be entered upon final issuance**

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

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

10. 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.

11. Applicability

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

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

American Trim LLC

PTI Application: 03-17409

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Facility ID: 0306020025

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, 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	70.3

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K004) Screen printing line consisting of 5 screen printing machines, 2 roll coaters, 7 natural gas fired ovens and 1 liquid tape printing machine with an oven (Modification to PTI 03-10257, issued 10/29/97 to allow for change in permit allowables and establishment of federally enforceable emission limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	4365 lbs organic compounds (OC)/month & 26.19 tons OC/yr from cleanup operations for emissions units K004 & K005 combined See A.2.a
OAC rule 3745-31-05 (C)	63 tons OC/rolling, 12-month period from coating and cleanup operations from emissions unit K004 & K005 combined (See A.2.b.i and B.1.) 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined (See A.2.b.ii.)
OAC rule 3745-21-09 (U) (1) (c)	Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)
ORC 3704.03 (F) (4) (b) OAC rule 3745-114-01	See F.1.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U) (1) (c).
- 2.b** This permit establishes the following federally enforceable emission limitations

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for purposes of avoiding the requirements of 40 CFR part 63, Subpart M and OAC rule 77 (CAAA Title V permits) regulations:

- i. 63 tons OC/rolling, 12-month period from coating and cleanup operations from emissions unit K004 & K005 combined (See B.1.). For purposes of federal enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).
- ii. 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined.

Rolling emission limitations were initially established in Permit to Install (PTI) #03-10257 issued on December 14, 2006 and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

B. Operational Restrictions

- 1. The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions unit K004 & K005 combined, is limited by the following equation:

$$\sum [M=1,12] \{ \sum [i=1,n] (V_i G_i) \div 2000 \text{ lbs/ton} \} \leq 63.0$$

where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission unit K004

The applicant will use existing records to determine compliance with the rolling 12-month restriction. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for the

Emissions Unit ID: **K004**

coating line:

- a. the name and identification number of each coating, as applied;
- b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2, as follows:

$$(C_{\text{VOC},2})_A = \frac{\sum_{i=1}^n C_{\text{VOC},2i} L_{Ci} (V_{Si} + V_{\text{VOC}i})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{\text{VOC}i})}$$

where:

$(C_{\text{VOC},2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{\text{VOC},2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{\text{VOC},2} = (D_C)(W_{\text{VOC}}) / V_S + V_{\text{VOC}}$$

where:

D_C is the density of coating, in pounds of coating per gallon of coating.

$$W_{\text{VOC}} = W_{\text{VM}} - W_W - W_{\text{ES}}$$

V_S is the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{\text{VOC}} = V_{\text{VM}} - V_W - V_{\text{ES}}$$

W_{VM} weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W weight fraction of water in coating, in pound of water per pound of coating.

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W_{ES} weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content.

2. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions unit K004 & K005 combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds per gallons, as applied;
 - c. the volume, in gallons, of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed ($C.2.b. \times C.2.c.$), in pounds; and

The company may calculate OC emissions from cleanup operations in

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accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- e. the rolling, 12-month OC emission rate, in tons.

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

- 3. The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit K004 & K005 combined:

- a. the company name and identification for each cleanup material employed;
- b. the volume, in gallons, of each cleanup material employed;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the OC emission rate, in pounds, for each cleanup material employed (C.3.b. x C.3.c.);
- e. the total OC emissions rate from all cleanup materials employed (summation of C.3.d.), in pounds; and

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- f. the annual year-to-date OC emissions, in tons, (summation of C.2.e. x 1 ton/2000 pounds) for each calendar month to date from January to December.

Note: The information required above must be recorded for the materials as applied,

Emissions Unit ID: **K004**

including any thinning solvents added at the emissions unit.

4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K004, K005, K006, P005, & P006 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate (C.4.b. x C.4.c.) for each individual coating and cleanup material employed, in lbs/month;
 - e. the total HAP rate for the combination of all HAPs from all coatings and cleanup materials employed (sum of C.4.d. for all HAPs), in lbs/month; and
 - f. the rolling, 12- month individual HAP and combined HAPs emission rates, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month organic compound emissions limitation of 63 tons from coating and cleanup material operations for emissions units K004 & K005 combined;
 - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions unit K004, K005, K006, P005, & P006 combined; and
 - c. any exceedance of the monthly or annual cleanup material emissions limitations specified in Section A.1. of this permit.

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

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2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeded the applicable limitation in section A.1. of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. **Emission Limitation:**

4365 lbs OC/month & 26.19 tons OC/yr from cleanup operations for emissions units K004 & K005 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

b. **Emission Limitation:**

63 tons OC/rolling, 12-month period from coating and cleanup operations for emissions unit K004 & K005 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

c. **Emission Limitation:**

9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.4. of this permit.

d. **Emission Limitation:**

Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme

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performance coating (daily volume-weighted average)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

F. Miscellaneous Requirements

1. Compliance with Ohio EPA's "Air Toxics Policy" was previously demonstrated in PTI #03-10257, issued on October 29, 1997, for the following pollutants associated with coatings employed in emissions units K004 & K005:

2-ethoxy ethanol
dipropylene glycol mono-methyl ether
toluene
methyl ethyl ketone

PTI #03-17409 does not result in an increase of any of the above mentioned pollutants and as such, air toxic modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03 (G) (4) (b) was not required for these pollutants. PTI #03-17409 did result in the emissions of new toxic air contaminants, however, modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03 (G) (4) (b) was not necessary because the emissions unit's maximum annual emissions for each new toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for an obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K005) - Screen printing line consisting of 5 stage UV print machine, 1 screen print machine, 2 roll coaters, 7 ng ovens, and 1 liquid tape print machine w/oven (Modification to PTI 03-10257, issued 10/29/97, to allow for change in permit allowables and establishment of federally enforceable emission limitations).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	4365 lbs organic compounds (OC)/month & 26.19 tons OC/yr from cleanup operations for emissions units K004 & K005 combined See A.2.a
OAC rule 3745-31-05 (C)	63 tons OC/rolling, 12-month period from coating and cleanup operations for emissions unit K004 & K005 combined (See A.2.b.i. and B.1.) 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined (See A.2.b.ii.)
OAC rule 3745-21-09 (U) (1) (c)	Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)
ORC 3704.03 (F) (4) (b) OAC rule 3745-114-01	See F.1.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C) and OAC rule 3745-21-09 (U) (1) (c).

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- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding the requirements of 40 CFR part 63, Subpart M and OAC rule 77 (CAA Title V permits) regulations:
- i. 63 tons OC/rolling, 12-month period from coating and cleanup operations from emissions unit K004 & K005 combined (See B.1.). For purposes of federal enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).
 - ii. 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined.

Rolling emission limitations were initially established in Permit to Install (PTI) #03-10257 issued on December 14, 2006 and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

B. Operational Restrictions

1. The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions unit K004 & K005 combined, is limited by the following equation:

$$\sum [M=1,12] \{ \sum [i=1,n] (V_i G_i) \div 2000 \text{ lbs/ton} \} \leq 63.0$$

where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emission unit K004

The applicant will use existing records to determine compliance with the rolling 12-month restriction. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

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- a. the name and identification number of each coating, as applied;
- b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2, as follows:

$$(C_{\text{VOC},2})_A = \frac{\sum_{i=1}^n C_{\text{VOC},2i} L_{Ci} (V_{Si} + V_{\text{VOC}i})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{\text{VOC}i})}$$

where:

$(C_{\text{VOC},2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{\text{VOC},2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{\text{VOC},2} = (D_C)(W_{\text{VOC}}) / V_S + V_{\text{VOC}}$$

where:

D_C is the density of coating, in pounds of coating per gallon of coating.

$$W_{\text{VOC}} = W_{\text{VM}} - W_W - W_{\text{ES}}$$

V_S is the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{\text{VOC}} = V_{\text{VM}} - V_W - V_{\text{ES}}$$

W_{VM} weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

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V_{VM} volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content.

2. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions unit K004 & K005 combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds per gallons, as applied;
 - c. the volume, in gallons, of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (C.2.b. x C.2.c.), in pounds; and

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

Emissions Unit ID: **K005**

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

- e. the rolling, 12-month OC emission rate, in tons.

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

3. The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit K004 & K005 combined:

- a. the company name and identification for each cleanup material employed;
- b. the volume, in gallons, of each cleanup material employed;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the OC emission rate, in pounds, for each cleanup material employed (C.3.b. x C.3.c.);
- e. the total OC emissions rate from all cleanup materials employed (summation of C.3.d.), in pounds; and

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- f. the annual year-to-date OC emissions, in tons, (summation of C.2.e. x 1 ton/2000 pounds) for each calendar month to date from January to December.

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

Emissions Unit ID: **K005**

4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K004, K005, K006, P005, & P006 combined:
 - a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate (C.4.b. x C.4.c.) for each individual coating and cleanup material employed, in lbs/month;
 - e. the total HAP rate for the combination of all HAPs from all coatings and cleanup materials employed (sum of C.4.d. for all HAPs), in lbs/month; and
 - f. the rolling, 12- month individual HAP and combined HAPs emission rates, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month organic compound emissions limitation of 63 tons from coating and cleanup material operations for emissions units K004 & K005 combined;
 - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions unit K004, K005, K006, P005, & P006 combined; and
 - c. any exceedance of the monthly or annual cleanup material emissions limitations specified in Section A.1. of this permit.

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

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted

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average VOC content exceeded the applicable limitation in section A.1. of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

- a. **Emission Limitation:**

- a. 4365 lbs OC/month & 26.19 tons OC/yr from cleanup operations for emissions units K004 & K005 combined

- Applicable Compliance Method:**

- Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

- b. **Emission Limitation:**

- b. 63 tons OC/rolling, 12-month period from coating and cleanup operations for emissions unit K004 & K005 combined

- Applicable Compliance Method:**

- Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

- c. **Emission Limitation:**

- c. 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined

- Applicable Compliance Method:**

- Compliance shall be based upon the record keeping requirements specified in section C.4. of this permit.

- d. **Emission Limitation:**

- d. Coatings applied in the coating operation shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

Emissions Unit ID: P005

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

F. Miscellaneous Requirements

1. Compliance with Ohio EPA's "Air Toxics Policy" was previously demonstrated in PTI #03-10257, issued on October 29, 1997, for the following pollutants associated with coatings employed in emissions units K004 & K005:
2-ethoxy ethanol
dipropylene glycol mono-methyl ether
toluene
methyl ethyl ketone

PTI #03-17409 does not result in an increase of any of the above mentioned pollutants and as such, air toxic modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03 (G) (4) (b) was not required for these pollutants. PTI #03-17409 did result in the emissions of new toxic air contaminants, however, modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03 (G) (4) (b) was not necessary because the emissions unit's maximum annual emissions for each new toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for an obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P005) - Clean room 2, screen washer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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OAC rule 3745-31-05 (A) (3)	Emissions of organic compounds shall not exceed 1216.67 lbs/month from emissions units P005 & P006 combined Emissions of organic compounds shall not exceed 7.3 tons per year from emissions units P005 & P006 combined
OAC rule 3745-31-05 (C)	9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined (See A.2.b.i.)
OAC rule 3745-21-07 (G) (2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day See A.2.a

2. Additional Terms and Conditions

- 2.a** On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.
- 2.b** This permit establishes the following federally enforceable emission limitation for purposes of avoiding the requirements of 40 CFR part 63, Subpart M and OAC rule 77 (CAAA Title V permits) regulations:
- i. 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined.

Rolling emission limitations were initially established in Permit to Install (PTI) #03-10257 issued on December 14, 2006 and, as such, rolling HAP emission records exist. The applicant shall use the existing records to

Emissions Unit ID: P005

determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P005:
 - a. the company identification for each cleaning solvent employed;
 - b. the number of gallons of each cleaning solvent employed;
 - c. the organic compound content of each cleaning solvent employed, in pounds per gallon;
 - d. the organic compound emission rate for each cleaning solvent employed, in pounds per day (C.1.b. x C.1.c);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- e. the total organic compound emission rate for all cleaning solvents employed, in pounds per day (summation of C.1.d.);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate (C.1.e./C.1.f.), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for

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emissions units P005 & P006 combined:

- a. the company identification for each cleaning solvent employed
- b. the volume, in gallons, for each cleaning solvent employed;
- c. the OC content of each cleaning solvent employed, in pounds per gallon;
- d. the OC emission rate, in pounds, for each cleaning solvent employed (C.2.b. x C.2.c.);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- e. the total OC emissions rate, in pounds, from all cleaning solvents employed (summation of C.2.d.); and
 - f. the annual year-to-date OC emissions, in tons, from all cleaning solvents employed (sum of C.3.e. for each calendar month to date from January to December divided by 2000 lbs/ton).
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K004, K005, K006, P005, & P006 combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate (C.4.b. x C.4.c.) for each individual coating and cleanup material employed, in lbs/month;

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- e. the total HAP rate for the combination of all HAPs from all coatings and cleanup materials employed (sum of C.4.d. for all HAPs), in lbs/month; and
 - f. the rolling, 12- month individual HAP and combined HAPs emission rates, in tons.
4. The permit to install for emissions units P005 & P006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Diproylene Glycol Methyl Ether*

TLV (mg/m³): 606.13

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 699

MAGLC (ug/m³): 14431.67

*All emissions assumed to be Diproylene Glycol Methyl Ether since it has the lowest TLV

5. 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:

Emissions Unit ID: P005

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install 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) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the

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following information:

- a. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions unit K004, K005, K006, P005, & P006 combined;
- b. an identification of each day during which the average hourly organic compounds emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
- c. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
- d. any exceedance of the monthly organic compound emission limitation specified in section A.1. of this permit.

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

2. The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P005 & P006 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in term C.1.
 - b. **Emission Limitation:**
Emissions of organic compounds shall not exceed 7.3 tons per year from emissions units P005 & P006 combined

Emissions Unit ID: P005

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term C.2.

c. **Emission Limitation:**

Emissions of organic compounds shall not exceed 1216.67 lbs/month from emissions units P005 & P006 combined

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term C.2.

d. **Emission Limitation:**

9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compounds contents of all cleaning solvents employed in the emissions unit.

F. Miscellaneous Requirements

None.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P006) - Clean room 3, screen washer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	Emissions of organic compounds shall not exceed 1216.67 lbs/month from emissions units P005 & P006 combined Emissions of organic compounds shall not exceed 7.3 tons per year from emissions units P005 & P006 combined
OAC rule 3745-31-05 (C)	9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined (See A.2.b.i.)
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day See A.2.a

2. Additional Terms and Conditions

- 2.a On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

Emissions Unit ID: **P006**

2.b This permit establishes the following federally enforceable emission limitation for purposes of avoiding the requirements of 40 CFR part 63, Subpart M and OAC rule 77 (CAAA Title V permits) regulations:

- i. 9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined.

Rolling emission limitations were initially established in Permit to Install (PTI) #03-10257 issued on December 14, 2006 and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emission unit P006:
 - a. the company identification for each cleaning solvent employed;
 - b. the number of gallons of each cleaning solvent employed;
 - c. the organic compound content of each cleaning solvent employed, in pounds per gallon;
 - d. the organic compound emission rate for each cleaning solvent employed, in pounds per day (C.1.b. x C.1.c);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off

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site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. the total organic compound emission rate for all cleaning solvents employed, in pounds per day (summation of C.1.d.);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate (C.1.e./C.1.f.), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for emissions units P005 & P006 combined:
- a. the company identification for each cleaning solvent employed
 - b. the volume, in gallons, for each cleaning solvent employed;
 - c. the OC content of each cleaning solvent employed, in pounds per gallon;
 - d. the OC emission rate, in pounds, for each cleaning solvent employed (C.2.b. x C.2.c.);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

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

- e. the total OC emissions rate, in pounds, from all cleaning solvents employed (summation of C.2.d.); and
 - f. the annual year-to-date OC emissions, in tons, from all cleaning solvents employed (sum of C.3.e. for each calendar month to date from January to December divided by 2000 lbs/ton).
3. The permittee shall collect and record the following information regarding HAP

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emissions each month for emissions units K004, K005, K006, P005, & P006 combined:

- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate (C.4.b. x C.4.c.) for each individual coating and cleanup material employed, in lbs/month;
 - e. the total HAP rate for the combination of all HAPs from all coatings and cleanup materials employed (sum of C.4.d. for all HAPs), in lbs/month; and
 - f. the rolling, 12- month individual HAP and combined HAPs emission rates, in tons.
4. The permit to install for emissions units P005 & P006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Diproylene Glycol Methyl Ether*

TLV (mg/m³): 606.13

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 699

MAGLC (ug/m³): 14431.67

Emissions Unit ID: P006

*All emissions assumed to be Diproylene Glycol Methyl Ether since it has the lowest TLV

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install 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) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. 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

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pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions unit K004, K005, K006, P005, & P006 combined;
 - b. an identification of each day during which the average hourly organic compounds emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - c. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
 - d. any exceedance of the monthly organic compound emissions limitation specified in section A.1. of this permit.

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

2. The permittee shall submit annual reports that specify the total organic compound emissions from emissions unit P005 & P006 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: P006

- a. **Emission Limitation:**
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day
- Applicable Compliance Method:**
Compliance shall be based on the record keeping requirements as specified in term C.1.
- b. **Emission Limitation:**
Emissions of organic compounds shall not exceed 7.3 tons per year from emissions units P005 & P006 combined
- Applicable Compliance Method:**
Compliance shall be based on the record keeping requirements as specified in term C.2.
- c. **Emission Limitation:**
Emissions of organic compounds shall not exceed 1216.67 lbs/month from emissions units P005 & P006 combined
- Applicable Compliance Method:**
Compliance shall be based on the record keeping requirements as specified in term C.2.
- d. **Emission Limitation:**
9.5 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, P005, & P006 combined
- Applicable Compliance Method:**
Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compounds contents of all cleaning solvents employed in the emissions unit.

F. Miscellaneous Requirements

None.