Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/25/2012

Certified Mail

Facility ID: 0868030155
Permit Number: P0108888
County: Preble

Mrs. Cheryl White
Neaton Auto Products Manufacturing, Inc.
975 South Franklin Street
Eaton, OH 45320-9400

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 5/16/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Regional Air Pollution Control Agency

Response to Comments

Facility ID:	0868030155
Facility Name:	Neaton Auto Products Manufacturing, Inc.
Facility Description:	motor vehicle parts and accessories
Facility Address:	975 South Franklin Street 688 Eaton, OH 45320-0688 Preble County
Permit:	P0108888, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Register Herald on 05/23/2012. The comment period ended on 06/22/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: No comment was received

b. Response: None

Carlos Lynch 06/22/2012

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Neaton Auto Products Manufacturing, Inc.

Facility ID:	0868030155
Permit Number:	P0108888
Permit Type:	Renewal
Issued:	6/25/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Neaton Auto Products Manufacturing, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Inspections and Information Requests 14
26. Scheduled Maintenance/Malfunction Reporting 14
27. Permit Transfers 15
28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions 16
C. Emissions Unit Terms and Conditions 19
1. K016, Paint Booth 3 20
2. K017, Paint Booth 3 Touch Up 35
3. R003, PB7 Finisher Paint System 41
4. R004, TK4 Glue Booth 56
5. R019, Paint Booth 4 Central 5 64
6. Emissions Unit Group -RIM #13 and #14: P021,P024, ... 70
7. Emissions Unit Group -RIM #17 and #18: P039,P040, ... 75
8. Emissions Unit Group -RIM #19, #20, #21 and #22: P041,P042,P043,P044, ... 80
9. Emissions Unit Group -TAO hand spray booths #1 and #2: R001,R002, ... 85

Authorization

Facility ID: 0868030155
Facility Description: motor vehicle parts and accessories
Application Number(s): A0042601
Permit Number: P0108888
Permit Description: Renewal of an existing Title V permit for Neaton Auto Products which includes paint booths and reaction injection molding booths.
Permit Type: Renewal
Issue Date: 6/25/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0094080

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

Neaton Auto Products Manufacturing, Inc.
975 South Franklin Street
688
Eaton, OH 45320-0688

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(2) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

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

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

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

25. Inspections and Information Requests

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

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

26. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air

agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The Ohio EPA has approved the compliance assurance monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units K016 and R003. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   (Authority for term: 40 CFR Part 64)

3. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12-month summations.

   [Authority for Term: OAC rule 3745-77-07(B)(1)]

4. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)* that are applied in the facility:

   a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b. the name/identification of each individual HAP contained in each material applied (and identified in a.) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

   c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

   d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of b. times c. for all the materials applied during the month, divided by 2,000 pounds;

   e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d.;

   f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d., for the present month plus the previous 11 months of operation, in ton(s); and

   g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in e., for the present month plus the previous 11 months of operation, in ton(s).

   *A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials

   [Authority for Term: OAC rule 3745-77-07(B)(1)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

   a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and

   b. allexceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed.

   [Authority for Term: OAC rule 3745-77-07(B)(1)]

6. Compliance with the emission limitations in B.3 shall be determined in accordance with the following methods:

   a. Emission Limitation:

   9.9 tons for each individual HAP/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in B.4.

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

   b. Emission Limitation:

24.9 tons for all HAPs combined/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in B.4.

C. Emissions Unit Terms and Conditions

1. K016, Paint Booth 3

Operations, Property and/or Equipment Description:

Paint Booth 3; Surface coating of plastic parts with a flash-off tunnel, common infrared drying oven which is shared with K017 and a natural gas curing oven with a permanent total enclosure venting to a regenerative thermal oxidizer

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

(1) See d)(12) through d)(14).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04363 issued 05/23/2002	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 1.63 lbs/hr from coatings and 3.03 tons/year from coatings and cleanup materials. See b)(2)a. and b)(2)f. The requirements established pursuant to this rule also include compliance with the requirement of OAC rule 3745-17-11(C).
b.	OAC rule 3745-21-07(M)(1) and (M)(2).	The requirements established pursuant to this rule is less stringent than the requirement established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(C)	See d)(15) through d)(20) and e)(1)f.
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(1), d)(7) through d)(9), e)(1).
e.	Compliance with Ohio EPA "Air Toxics Policy".	See d)(12) through d)(14).

(2) Additional Terms and Conditions

a. The organic compound (OC) emissions from this emissions unit, shall be controlled through the application of a permanent total enclosure for 100 percent

capture and a regenerative thermal oxidizer (RTO) system, operating at a minimum of 95% overall OC removal/destruction efficiency.

b. All of the OC emissions from this emissions unit shall be vented to the regenerative thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all organic compound emissions are captured, contained, and directed to the control device.

d. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each OC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)0.5$$

ii. The total area of all natural draft openings (AN) shall not exceed 5 percent of the total surface area of the enclosure (AT), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = AN / AT$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “ii”, shall be completely closed to any air movement during process operations.

v. All OC emissions shall be captured and contained for discharge through the control device.

[40 CFR 51, Appendix M, Method 204]

e. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the OC emissions from this emissions unit.

f. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

c) Operational Restrictions

(1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 64 and PTI 08-04363]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the regenerative thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the regenerative thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the regenerative thermal oxidizer was/were in operation, during which the average combustion temperature within the regenerative thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the

most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and regenerative thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of five years.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(3) Whenever the monitored average combustion temperature within the regenerative thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(4) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each OC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each OC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(5) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(6) The permittee shall collect and record the following information each day:

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(7) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer controlling OC emissions from this emissions unit has been developed for the monitoring of the combustion chamber temperature within the regenerative thermal oxidizer. The CAM performance indicator and indicator range, for this temperature requirement is specified in Section d)(2). When the temperature is outside of the indicator range specified in d)(2), corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required.

Upon detecting an excursion of the regenerative thermal oxidizer's temperature indicator range listed in d)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04363]

(8) The CAM plan for monitoring the capture efficiency of the capture system for this emissions unit has been developed for the monitoring of the permanent total enclosure (PTE) differential pressure. The CAM performance indicator, and indicator range, for PTE differential pressure is specified in c)(1). When the PTE differential pressure is outside of the indicator range specified in c)(1), corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required.

Upon detecting an excursion of the PTE differential pressure range listed in c)(1), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture by installing, calibrating, maintaining and operating a pressure measuring device to monitor the difference between the enclosure static pressure and the surrounding plant static pressure.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the PTE differential pressure on a daily basis.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04363]

(9) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04363]

(10) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total uncontrolled OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(10)b. times d)(10)c. for each coating employed.

e. The total controlled OC emission rate from the coatings, in pounds i.e., d)(10)d. x the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

f. The company identification of each cleanup material employed.

g. The number of gallons of each cleanup material employed.

h. The OC content of each cleanup material employed, in pounds per gallon.

i. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(10)g. x d)(10)h. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(11) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(10)e., plus the monthly emissions from all cleanup materials applied, as recorded in d)(10)i.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(12) The permit to install for emissions units K016 and K017 were 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: toluene

TLV (ug/m3): 188,404

Maximum Hourly Emission Rate (lbs/hr): 8.13 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,041.1

MAGLC (ug/m3): 4,476.19 ug/m3

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.).

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(13) 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.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(15) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(16) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(17) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(18) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(19) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(20) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the regenerative thermal oxidizer was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the regenerative thermal oxidizer;

c. each incident of deviation described in “a” or ”b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the regenerative thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

g. all three hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C), 40 CFR Part 64 and PTI 08-04363]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from this emissions unit shall not exceed 1.63 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 3.03 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(11).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

c. Emission Limitation:

100% capture of OC emissions

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted 2.5 yrs after permit issuance.

ii. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure. The following test methods shall be employed:

Method 204 from 40 CFR Part 51 Appendix M; and

Method 2 from 40 CFR Part 60, Appendix A.

iii. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

iv. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the 'enclosure' through a forced

makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

FV= (Qo - Qi) /An

where:

Qo is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Qi is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

An is the total area of all natural draft openings in the enclosure.

v. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

vi. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:

(a) the diameter of each natural draft opening;

(b) the distance measured from each natural draft opening to each OC emitting point in the process;

(c) the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;

(d) the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling; and

(e) the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted 2.5 yrs after permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the 1.63 lbs OC/hr and an overall control efficiency for OC (OC) of 95%.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25, Method 25A, or Method 18.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

(3) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363].

g) Miscellaneous Requirements

(1) None.

2. K017, Paint Booth 3 Touch Up

Operations, Property and/or Equipment Description:

Paint Booth 3, touch up; Surface coating of plastic parts with a common infrared drying oven which is shared with K016

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

(1) See d)(3) through d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04363 issued 05/23/2002	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 6.5 lbs/hr from coatings and 7.3 tons/year from coatings and cleanup materials. See b)(1)a. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(6) through d)(12) and e)(1).
c.	Compliance with Ohio EPA "Air Toxics Policy".	See d)(3) through d)(5)

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(3) The permit to install for emissions units (K016 and K017) were 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: toluene

TLV (ug/m3): 188,404

Maximum Hourly Emission Rate (lbs/hr): 8.13 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,041.1

MAGLC (ug/m3): 4,476.19 ug/m3

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.).

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(4) 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.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(6) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(7) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(9) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

(12) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04363]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04363]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 6.5 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 7.3 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04363].

g) Miscellaneous Requirements

(1) None.

3. R003, PB7 Finisher Paint System

Operations, Property and/or Equipment Description:

Finisher Paint System including two booths, mix room, 2 flash tunnels, and convection oven with a permanent total enclosure venting to a regenerative thermal oxidizer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 5.42 lbs/hr from coatings and 5.42 tons/year from coatings and cleanup materials. See b)(2)a., b)(2)b. and b)(2)h. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-21-07(M)(1) and (M)(2).	The requirements established pursuant to this rule is less stringent than the requirement established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(C)	See d)(12) through d)(18) and e)(1)f.
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(1), d)(1) through d)(9), e)(1).

(2) Additional Terms and Conditions

a. The organic compound (OC) emissions from this emissions unit, shall be controlled through the application of a permanent total enclosure for 100 percent capture and a regenerative thermal oxidizer (RTO) system, operating at a minimum of 95% overall OC removal/destruction efficiency.

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

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

c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than 10 tons/year, taking into account the federally enforceable rule limit of an overall control efficiency of at least eighty-five per cent, by weight under OAC rule 3745-21-07(M)(2).

d. All of the OC emissions from this emissions unit shall be vented to the regenerative thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

e. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device.

f. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each OC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

ED = (4 area/π)0.5

ii. The total area of all natural draft openings (AN) shall not exceed 5 percent of the total surface area of the enclosure (AT), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

NEAR = AN / AT

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “ii”, shall be completely closed to any air movement during process operations.

v. All OC emissions shall be captured and contained for discharge through the control device.

[40 CFR 51, Appendix M, Method 204]

g. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the OC emissions from this emissions unit.

h. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

c) Operational Restrictions

(1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 64 and PTI 08-04862]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the regenerative

thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the regenerative thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the regenerative thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the regenerative thermal oxidizer was/were in operation, during which the average combustion temperature within the regenerative thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and regenerative thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of five years.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(3) Whenever the monitored average combustion temperature within the regenerative thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(4) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each OC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each OC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(5) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(6) The permittee shall collect and record the following information each day:

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(7) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer controlling OC emissions from this emissions unit has been developed for the monitoring of the combustion chamber temperature within the regenerative thermal oxidizer. The CAM performance indicator and indicator range, for this temperature requirement is specified in Section d)(3). When the temperature is outside of the indicator range specified in d)(3), corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required.

Upon detecting an excursion of the regenerative thermal oxidizer's temperature indicator range listed in d)(3), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(8) The CAM plan for monitoring the capture efficiency of the capture system for this emissions unit has been developed for the monitoring of the permanent total enclosure (PTE) differential pressure. The CAM performance indicator, and indicator range, for PTE differential pressure is specified in c)(1). When the PTE differential pressure is outside of the indicator range specified in c)(1), corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required.

Upon detecting an excursion of the PTE differential pressure range listed in c)(1), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture by installing, calibrating, maintaining and operating a pressure measuring device to monitor the difference between the enclosure static pressure and the surrounding plant static pressure.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the PTE differential pressure on a daily basis.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(9) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for Term: OAC rule 3745-77-07(A)(3), 40 CFR Part 64 and PTI 08-04862]

(10) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total uncontrolled OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(10)b. times d)(10)c. for each coating employed.

e. The total controlled OC emission rate from the coatings, in pounds i.e., d)(10)d. x the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

f. The company identification of each cleanup material employed.

g. The number of gallons of each cleanup material employed.

h. The OC content of each cleanup material employed, in pounds per gallon.

i. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(10)f. x d)(10)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04862]

(11) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(10)e., plus the monthly OC emissions from all cleanup materials applied, as recorded in d)(10)i.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04862]

(12) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(13) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(14) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(15) The permittee shall conduct periodic inspections of the waterwash control system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the

permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(16) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(17) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04862]

(18) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C)and PTI 08-04862]

(19) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each 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 a permittee to apply for and obtain a new or modified PTI 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 PTI.

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the regenerative thermal oxidizer was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the regenerative thermal oxidizer;

c. each incident of deviation described in “a” or ”b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the regenerative thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

f. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit wase in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C), 40 CFR Part 64 and PTI 08-04862]

(2) The permittee shall identify in the quarterly deviation report all three hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04862]

(3) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04862]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04862].

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 5.42 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 5.42 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(11).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862]

c. Emission Limitation:

100% capture of OC emissions

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted 2.5 yrs after permit issuance.

ii. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure. The following test methods shall be employed:

Method 204 from 40 CFR Part 51 Appendix M; and

Method 2 from 40 CFR Part 60, Appendix A.

iii. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

iv. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the 'enclosure' through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$$FV = (Qo - Qi) / An$$

where:

Qo is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Qi is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

An is the total area of all natural draft openings in the enclosure.

v. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration,

either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

vi. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:

(a) the diameter of each natural draft opening;

(b) the distance measured from each natural draft opening to each OC emitting point in the process;

(c) the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;

(d) the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling; and

(e) the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted 2.5 yrs after permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the 5.42 lbs OC/hr and an overall control efficiency for OC (OC) of 95%.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 25, Method 25A, or Method 18.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA s Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency. [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862]

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862]

(3) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04862].

g) Miscellaneous Requirements

(1) None.

4. R004, TK4 Glue Booth

Operations, Property and/or Equipment Description:

TK Glue booth-automatic adhesive spray booth installed post Aug, 3rd 2006.

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

(1) d)(10) through d)(13) and e)(3)..

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04937 issued 07/25/2008	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 19.97 lbs/hr from coatings and 21.39 tons/year from coatings and cleanup materials. See b)(2)a. The requirements established pursuant to this rule also include the compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review)	The emissions of OC from this emission unit shall not exceed 21.39 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.
d.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(10) through d)(13) and e)(3).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(2) The permittee shall calculate and maintain monthly records of the OCemissions, i.e., the sum of d)(1)d. plus d)(1)h., and the rolling 12-monthemissions of OC.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(10) The PTI application for this emissions unit, R004, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Methanol

TLV (mg/m3): 263

Maximum Hourly Emission Rate (lbs/hr): 1.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 195.92

MAGLC (ug/m3): 6,262

Toxic Contaminant: Cyclohexane

TLV (mg/m3): 345

Maximum Hourly Emission Rate (lbs/hr): 7.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 811.68

MAGLC (ug/m3): 8,214

The permittee, has demonstrated that emissions of Methanol and Cyclohexane, from emissions unit R004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level

concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month emissions limitation for OC.

b. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the Toxic Air Contaminate Statute, ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04937]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 19.97 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04937]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 21.39 tons/yr as a rolling 12-month summation from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04937]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04937].

g) Miscellaneous Requirements

(1) None.

5. R019, Paint Booth 4 Central 5

Operations, Property and/or Equipment Description:

Automated paint system Paint booth #4

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

(1) d)(10) through d)(12) and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04640 issued 02/24/2005	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 8.11 lbs/hr from coatings and 12.78 tons/year from coatings and cleanup materials. See b)(2)a. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).
c.	Compliance with Ohio EPA's "Air Toxic Policy"	See d)(10) through d)(12) and e)(2).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(10) The permit to install for emissions unit R019 were 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 for all the injection mold groups combined. 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: n-Butyl Acetate

TLV (ug/m3): 89.5

Maximum Hourly Emission Rate (lbs/hr): 1.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 48.52 ug/m3

MAGLC (ug/m3): 16,976 ug/m3

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.).

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

(11) 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.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

(2) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640].

(3) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04640]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 8.11 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04640]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 12.78 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04640]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04640].

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -RIM #13 and #14: P021,P024,

EU ID	Operations, Property and/or Equipment Description
P021	Reaction Injection Molding Booth #13
P024	Reaction Injection Molding Booth #14

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-1651 issued 05/10/1989	<u>For emissions units P021 and P024 individually</u>: The emissions of Organic Compound (OC) from this emissions unit shall not exceed 2.43 lbs/hr from coatings and 6.24 tons/year from coatings and cleanup materials. See b)(1)a. The requirements established pursuant to this rule also include compliance with the the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969]

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969]

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3), PTI 08-1651 and PTI 08-1969]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from this emissions unit shall not exceed 2.43 lbs/hr from coatings.

<u>Applicable Compliance Method</u>:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1651 and PTI 08-1969]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 6.24 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1651 and PTI 08-1969]

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

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1651 and PTI 08-1969]

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -RIM #17 and #18: P039,P040,

EU ID	Operations, Property and/or Equipment Description
P039	Reaction Injection Molding Booth #17
P040	Reaction Injection Molding Booth #18

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-3045 issued 09/20/1995	<u>For emissions units P039 and P040 individually</u>: The emissions of Organic Compound (OC) from this emissions unit shall not exceed 1.6 lbs/hr from coatings and 7.3 tons/year from coatings and cleanup materials. See b)(1)a. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3045]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3045]

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C)and PTI 08-3045].

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3045]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3045]

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3045]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from this emissions unit shall not exceed 1.60 lbs/hr from coatings.

<u>Applicable Compliance Method</u>:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3045]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 7.3 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3045]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3045]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -RIM #19, #20, #21 and #22: P041,P042,P043,P044,

EU ID	Operations, Property and/or Equipment Description
P041	Reaction Injection Molding Booth #19
P042	Reaction Injection Molding Booth #20
P043	Reaction Injection Molding Booth #21
P044	Reaction Injection Molding Booth #22

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-3782 issued 01/14/1998	<u>For emissions units P041, P042, P043 and P044 individually</u>: The emissions of Organic Compound (OC) from this emissions unit shall not exceed 2.43 lbs/hr from coatings and 7.3 tons/year from coatings and cleanup materials. See b)(1)a. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3782]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3782]

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-3782]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3782]

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3782]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 2.43 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3782]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 7.3 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3782]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3782].

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -TAO hand spray booths #1 and #2: R001,R002,

EU ID	Operations, Property and/or Equipment Description
R001	manual paint spray booth #1
R002	manual paint spray booth #2

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

(1) d)(10) through d)(11) and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04846 issued 05/01/2007	<u>For emissions units R001 and R002 individually</u>: The emissions of Organic Compound (OC) from this emissions unit shall not exceed 8.31 lbs/hr from coatings and 7.3 tons/year from coatings and cleanup materials. The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-17-11(C). See b)(2)a.
b.	OAC rule 3745-17-11(C)	See d)(3) through d)(9) and e)(1).
c.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(10) through d)(11) and e)(3).

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emission unit:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04846]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04846].

(3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the

permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C) and PTI 08-04846].

(10) The permit to install for this emissions unit R001 and R002 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 178 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Pollutant: MIBK

TLV (mg/m3): 205 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.22 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 353 ug/m3

MAGLC (ug/m3): 4,881 ug/m3

(11) The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and

BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g.,increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify following any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(A)(3), OAC rule 3745-17-11(C)and PTI 08-04846]

(2) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04846]

(3) The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04846]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04846]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 8.31 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable OC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04846]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed 7.3 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04846]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04846]

g) Miscellaneous Requirements

(1) None.