



Environmental Protection Agency

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

10/31/2012

Mr. Eric Tanner
Belletech Corp - North
700 W Lake Ave
Bellefontaine, OH 43311

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0546015009
Permit Number: P0111652
Permit Type: Initial Installation
County: Logan

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Bellefontaine Examiner. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-SWDO; Indiana



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (avoid Title V requirements)

2. Source Description:

This permit covers the installation of; priming station, dip tank coating; Adhesive dispense station, and two Glass Priming station at Belletech's 20 Hunter Place, Bellefontaine, Ohio facility, 0546015009. This new facility will work with Belletech's existing facility at 700 W. Lake Ave., 0546010102, to produce assorted automobile parts for the automotive industry.

3. Facility Emissions and Attainment Status:

The new facility 0546015009, potential will be:

- 24.3 tons of VOC;
- 9 tons of individual HAP; and
- 24 tons of combined HAP(s).

Guidance from Mike Hopkins and Lynne Martz, with the OHIO EPA Central Office DAPC, based on the recent 6th circuit court decision, we don't define the two facilities as "adjacent". Therefore there is no reason to have HAP(s) federally enforceable limitations that straddle both premise numbers to avoid combined Title V applicability.

The facility is located in Logan County, which is attainment for all regulated pollutants.

4. Source Emissions:

The following emissions units are covered in this permit:

- R101 Holder priming station, dip tank coating: has an hourly potential (BAT) of 6.4 lbs per hours and a voluntary rolling 12 month limit of 9.0 tons per rolling 12 month period;
- R102, Adhesive dispense station: has an hourly potential (BAT) of 0.5 lbs per hours and a voluntary rolling 12 month limit of 2.7 tons per rolling 12 month period;
- R103 Glass Priming station 1: has an hourly potential (BAT) of 3.2 lbs per hours and a voluntary rolling 12 month limit of 6.3 tons per rolling 12 month period; and
- R104 Glass Priming station 2: has an hourly potential (BAT) of 3.2 lbs per hours and a voluntary rolling 12 month limit of 6.3 tons per rolling 12 month period.

5. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
OC/VOC	24.3, facility-wide each
HAP individual	9.0, facility-wide
HAPs combined	24.0 facility-wide
Air Toxic	< 1.0, each

PUBLIC NOTICE

10/31/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Belletech Corp - North
20 Hunter Place,
Bellefontaine, OH 43311
Logan County

FACILITY DESC.: Glass Product Manufacturing Made of Purchased Glass

PERMIT #: P0111652

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of four new coating operations to produce automotive parts

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Belletech Corp - North**

Facility ID:	0546015009
Permit Number:	P0111652
Permit Type:	Initial Installation
Issued:	10/31/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Belletech Corp - North

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Authorization

Facility ID: 0546015009

Application Number(s): A0045927

Permit Number: P0111652

Permit Description: Installation of four new coating operations to produce automotive parts

Permit Type: Initial Installation

Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 10/31/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Belletech Corp - North
20 Hunter Place
Bellefontaine, OH 43311

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

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0111652

Permit Description: Installation of four new coating operations to produce automotive parts

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

Emissions Unit ID:

R101

Company Equipment ID:

R101 Holder priming station

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

Emissions Unit ID:

R102

Company Equipment ID:

K102 Adhesive dispense station

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

Group Name: Glass priming stations

Emissions Unit ID:

R103

Company Equipment ID:

R103 Glass Priming station

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

Emissions Unit ID:

R104

Company Equipment ID:

R104 Glass Priming station

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Belletech Corp - North

Permit Number: P0111652

Facility ID: 0546015009

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) Sections B2., 3., and 4., below.
2. The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility R101, R102, R103, and R104 shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: R101, R102, R103, and R104:
 - a) the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b) the name and identification number of each HAP containing material employed;
 - c) the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d) the amount of each HAP containing material employed, in gallons;
 - e) the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f) the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g) the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h) the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* 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, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - b) The rolling 12 individual HAP emissions is equal to or greater than 9.0 tons from this facility; and
 - c) The rolling 12 month combined HAP's emissions are equal to or greater than 24 tons from this facility.
 - d) the probable cause of each deviation (excursion);
 - e) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - f) the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions

1. R101, R101 Holder priming station, dip tank coating

Operations, Property and/or Equipment Description:

Holder coating priming station, coating plastic parts.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)g., and d)(4), below.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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)(i) effective 11/30/2001	The hourly VOC emissions from the coatings employed in this emissions unit shall not exceed 6.40 pounds See sections b)(2)a., and b., below..
b.	OAC rule 3745-31-05 (A)(3)(a)(ii) effective 12/01/2006	See section b)(2)c. below.
c.	OAC rule 3745-31-05(F)	The volatile organic compound (VOC) emissions from all materials employed in this emissions unit shall not exceed 9.0 tons per rolling 12 month period.
e.	OAC rule 3745-21-07(M)	See section b)(2)d., below.
f.	OAC rule 3745-17-11(C)	See section b)(2)e., below.
g.	OAC rule 3745-114 ORC 3704.03(F)	Ohio Toxic Rule See section d)(4), below

(2) Additional Terms and Conditions

- a. The emissions limitation of 6.40 pounds of VOC per hour is based upon 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 limit.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F).

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06.

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.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) for VOC is less than 10 tons per year taking into consideration legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

- d. The emission units are exempt from the requirements of OAC rule 3745-21-07(M) because they do not meet all of the conditions in OAC rule 3745-21-07(M)(3)(a).

- e. The emission units are exempt from the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(h).

c) Operational Restrictions

- (1) The materials employed in this emissions unit shall not exceed the following:
 - a. 2,700 gallons of coating per rolling 12 month period;
 - b. 6.40 pounds of VOC per gallon of coating employed;
 - c. 50 gallons of liquid organic cleanup per rolling 12 month period; and
 - d. 7.52 pounds per gallon of liquid organic cleanup materials employed.
- (2) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	270
1-2	540
1-3	810
1-4	1,080
1-5	1,350
1-6	1,620
1-7	1,890
1-8	2,160
1-9	2,430
1-10	2,700
1-11	2,700
1-12	2,700

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month period coating usage figures.

- (3) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the liquid organic cleanup material usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Liquid organic cleanup Usage</u>
1	5
1-2	10
1-3	15
1-4	20
1-5	25
1-6	30

Draft Permit-to-Install and Operate

Belletech Corp - North

Permit Number: P0111652

Facility ID: 0546015009

Effective Date: To be entered upon final issuance

1-7	35
1-8	40
1-9	45
1-10	50
1-11	50
1-12	50

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month period coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information::

- a. The name and identification number of each coating employed;
- b. The VOC content of each coating and/or employed, in pounds per gallon, as applied;
- c. The number of gallons of each coating employed;
- d. The total VOC emissions from all coatings employed, in pounds [i.e., the summation of [d)(1)b. x d)(1)c.]/2000 for coating employed];
- e. The 12-month rolling total amount of VOC emitted from the use of coatings, in tons per last 12-month period.
- f. The name and identification number of each cleanup material employed;
- g. The VOC content of each cleanup material employed, in pounds per gallon;
- h. The number of gallons of each cleanup material employed; and
- i. The total VOC emissions from all cleanup materials employed, in pounds [i.e., summation of [d)(1)g. x d)(1)h.]/2000 for cleanup material employed].
- j. The 12-month rolling total amount of VOC emitted from the use of cleanup material, in tons per last 12-month period; and
- k. The total 12-month total VOC emitted from this emissions unit, in tons [i.e., summation of d)(1)e. + d)(1)j.].

(2) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:

- a. the coating usage for each month; and
- b. the cumulative coating usage for calendar month(s).

- (3) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:
 - a. the liquid organic cleanup material usage for each month; and
 - b. the cumulative liquid organic cleanup material usage for calendar month(s).
- (4) 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 PTIO 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 PTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The volatile organic compound (VOC) emissions exceeded 9.0 tons per rolling 12 month period;
 - ii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage levels specified in section d) of this permit; and
 - iii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative liquid organic cleanup material employed usage levels specified in section d) of this permit.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

f) Testing Requirements

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

a. Emission Limitation -

6.40 pounds VOC per hour

The above limit is based on the following equation:

$$HER = Cu \times VOCc$$

Where:

HER = Hourly emission rate, in pounds;

CU = Coating(s) usage in gallons; and

VOCc = VOC content of the coating(s), in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the maximum hourly coating rate not exceeding 1.0 gallons and the maximum coating VOC Content not exceeding 6.40 pounds per gallon. Prior to any modifications to this operation that would cause an increase in the hourly emission rate, the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation -

9.0 tons VOC per rolling 12 month period, from coatings employed

The above limit is based on the following equation:

$$YER = [(Cu \times VOCc) + (Clu \times VOCc)] / 2000$$

Where:

YER = Year emission rate, in tons;

Cu = Coating(s) usage in gallons; and

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Clu = Coating(s) usage in gallons; and

VOCc = VOC content of the coating(s), in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the records in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

2. R102, K102 Adhesive dispense station

Operations, Property and/or Equipment Description:

R102, Adhesive dispense station

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)g., and d)(4), below.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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)(i) as effective 11/30/2001	The hourly VOC emissions from the adhesives employed in this emissions unit shall not exceed 0.5 pounds See sections b)(2)a., and b., below..
b.	OAC rule 3745-31-05 (A)(3)(a)(ii) as effective 12/01/2006	See section b)(2)c. below.
c.	OAC rule 3745-31-05(F)	The volatile organic compound (VOC) emissions from all materials employed in this emissions unit, including cleanup, shall not exceed 2.7 tons per rolling 12 month period.
e.	OAC rule 3745-21-07(M)	See section b)(2)d., below.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(C)	See section b)(2)e., below.
g.	OAC rule 3745-114 ORC 3704.03(F)	Ohio Toxic Rule See section d)(4) , below.

(2) Additional Terms and Conditions

- a. The emissions limitation of 0.5 pounds of VOC per hour is based upon 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 limit.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F).

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06.

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.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) for VOC is less than 10 tons per year taking into

consideration legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

- d. The emission units are exempt from the requirements of OAC rule 3745-21-07(M) because they do not meet all of the conditions in OAC rule 3745-21-07(M)(3)(a).
- e. The emission units are exempt from the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1).

c) Operational Restrictions

- (1) The materials employed in this emissions unit shall not exceed the following:
 - a. 4,050 gallons of adhesives per rolling 12 month period;
 - b. 0.3 pounds of VOC per gallon of adhesives employed;
 - c. 540 gallons of liquid organic cleanup per rolling 12 month period; and
 - d. 7.52 pounds per gallon of liquid organic cleanup materials employed.
- (2) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the adhesive usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Adhesive Usage</u>
1	405
1-2	810
1-3	1,215
1-4	1,620
1-5	2,025
1-6	2,430
1-7	2,835
1-8	3,240
1-9	3,645
1-10	4,050
1-11	4,050
1-12	4,050

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month period coating usage figures.

- (3) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the liquid organic cleanup material usage levels specified in the following table:
- (4)

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Liquid organic cleanup Usage</u>
1	54
1-2	108
1-3	162
1-4	216
1-5	270
1-6	324
1-7	378
1-8	432
1-9	486
1-10	540
1-11	540
1-12	540

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month period coating usage figures.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall maintain monthly records of the following information::

- a. The name and identification number of each adhesive employed;
- b. The VOC content of each adhesive and/or employed, in pounds per gallon, as applied;
- c. The number of gallons of each adhesive employed;
- d. The total VOC emissions from all adhesive employed, in pounds [i.e., the summation of [d)(1)b. x d)(1)c.]/2000 for adhesive employed];
- e. The 12-month rolling total amount of VOC emitted from the use of adhesive, in tons per last 12-month period.
- f. The name and identification number of each cleanup material employed;
- g. The VOC content of each cleanup material employed, in pounds per gallon;
- h. The number of gallons of each cleanup material employed; and
- i. The total VOC emissions from all cleanup materials employed, in pounds [i.e., summation of [d)(1)g. x d)(1)h.]/2000 for cleanup material employed].
- j. The 12-month rolling total amount of VOC emitted from the use of cleanup material, in tons per last 12-month period; and
- k. The total 12-month total VOC emitted from this emissions unit, in tons [i.e., summation of d)(1)e. + d)(1)j.].

- (2) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:
 - a. the adhesive usage for each month; and
 - b. the cumulative adhesive usage for calendar month(s).
- (3) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:
 - a. the liquid organic cleanup material usage for each month; and
 - b. the cumulative liquid organic cleanup material usage for calendar month(s).
- (4) 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 PTIO 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 PTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The volatile organic compound (VOC) emissions exceeded 2.7 tons per rolling 12 month period;
 - ii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative adhesive usage levels specified in section d) of this permit; and
 - iii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative liquid organic cleanup material employed usage levels specified in section d) of this permit.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

f) Testing Requirements

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

a. Emission Limitation -

0.5 pounds VOC per hour

The above limit is based on the following equation:

$$HER = Au \times VOCc$$

Where:

HER = Hourly emission rate, in pounds;

Au = Adhesive(s) usage in gallons; and

VOCc = VOC content of the coating(s), in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the maximum hourly coating rate not exceeding 1.5 gallons and the maximum coating VOC Content not exceeding 0.3 pounds per gallon. Prior to any modifications to this operation that would cause an increase in the hourly emission rate, the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation -

2.7 tons VOC per rolling 12 month period, from coatings employed

The above limit is based on the following equation:

$$YER = [(Au \times VOCc) + (Clu \times VOCc)] / 2000$$

Where:

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YER = Year emission rate, in tons;

Au = Adhesive(s) usage in gallons;

Clu = Cleanup(s) usage in gallons; and

VOCc = VOC content of the coating(s), in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the records in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Glass priming stations: R103,R104,

EU ID	Operations, Property and/or Equipment Description
R103	R103 Glass Priming station, station 1
R104	R104 Glass Priming station, station 2

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

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

a. b)(1)g., and d)(4), below.

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

a. 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)(i) as effective 11/30/2001	The hourly VOC emissions from the adhesives employed in this emissions unit shall exceed 3.2 pounds See sections b)(2)a., and b., below..
b.	OAC rule 3745-31-05 (A)(3)(a)(ii) as effective 12/01/2006	See section b)(2)c. below.
c.	OAC rule 3745-31-05(F)	The volatile organic compound (VOC) emissions from all materials employed in this emissions unit, including cleanup, shall not exceed 6.3 tons per rolling 12 month period.
e.	OAC rule 3745-21-07(M)	See section b)(2)d., below.
f.	OAC rule 3745-17-11(C)	See section b)(2)e., below.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-114 ORC 3704.03(F)	Ohio Toxic Rule See section d) , below.

(2) Additional Terms and Conditions

- a. The emissions limitation of 3.2 pounds of VOC per hour is based upon 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 limit.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F).

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06.

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.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) for VOC is less than 10 tons per year taking into consideration legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

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- d. The emission units are exempt from the requirements of OAC rule 3745-21-07(M) because they do not meet all of the conditions in OAC rule 3745-21-07(M)(3)(a).
- e. The emission units are exempt from the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(h).

c) Operational Restrictions

- (1) The materials employed in this emissions unit shall not exceed the following:
 - a. 1,200 gallons of adhesives per rolling 12 month period;
 - b. 6.3 pounds of VOC per gallon of coating employed;
 - c. 650 gallons of liquid organic cleanup per rolling 12 month period; and
 - d. 7.52 pounds per gallon of liquid organic cleanup materials employed.
- (2) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	120
1-2	240
1-3	360
1-4	480
1-5	600
1-6	720
1-7	840
1-8	960
1-9	1,080
1-10	1,200
1-11	1,200
1-12	1,200

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month period coating usage figures.

- (3) To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the liquid organic cleanup material usage levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Cleanup Usage</u>
1	65
1-2	130
1-3	195
1-4	260
1-5	325
1-6	390
1-7	455
1-8	520
1-9	585
1-10	650
1-11	650
1-12	650

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12 month period coating usage figures.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall maintain monthly records of the following information::

- a. The name and identification number of each adhesive employed;
- b. The VOC content of each adhesive and/or employed, in pounds per gallon, as applied;
- c. The number of gallons of each adhesive employed;
- d. The total VOC emissions from all adhesive employed, in pounds [i.e., the summation of [d)(1)b. x d)(1)c.]/2000 for adhesive employed];
- e. The 12-month rolling total amount of VOC emitted from the use of adhesive, in tons per last 12-month period.
- f. The name and identification number of each cleanup material employed;
- g. The VOC content of each cleanup material employed, in pounds per gallon;
- h. The number of gallons of each cleanup material employed; and
- i. The total VOC emissions from all cleanup materials employed, in pounds [i.e., summation of [d)(1)g. x d)(1)h.]/2000 for cleanup material employed].
- j. The 12-month rolling total amount of VOC emitted from the use of cleanup material, in tons per last 12-month period; and
- k. The total 12-month total VOC emitted from this emissions unit, in tons [i.e., summation of d)(1)e. + d)(1)j.].

- (2) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:
 - a. the adhesive usage for each month; and
 - b. the cumulative adhesive usage for calendar month(s).
- (3) The permittee shall collect and record the following information each month for each emissions unit:
 - a. The name and identification number of each cleanup material employed;
 - b. The VOC content of each cleanup material employed, in pounds per gallon;
 - c. The number of gallons of each cleanup material employed; and
 - d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., summation of d)(2)b. x d)(2)c. for each cleanup material employed].
- (4) During the first 12 calendar months of operation, the permittee shall maintain monthly records of the following information:
 - a. the liquid organic cleanup material usage for each month; and
 - b. the cumulative liquid organic cleanup material usage for calendar month(s).
- (5) 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 PTIO 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 PTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. The volatile organic compound (VOC) emissions exceeded 6.3 tons per rolling 12 month period;
 - ii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative adhesive usage levels specified in section d) of this permit; and

- iii. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative liquid organic cleanup material employed usage levels specified in section d) of this permit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

f) Testing Requirements

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

- a. Emission Limitation -
3.2 pounds VOC per hour

The above limit is based on the following equation:

$$HER = Cu \times VOCC$$

Where:

HER = Hourly emission rate, in pounds;

Cu = Coating(s) usage in gallons; and

VOCC = VOC content of the coating(s), in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the maximum hourly coating rate not exceeding 1.5 gallons and the maximum coating VOC Content not exceeding 0.3 pounds per gallon. Prior to any modifications to this operation that would cause an increase in the hourly emission rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation -

6.3 tons VOC per rolling 12 month period, from coatings employed

The above limit is based on the following equation:

$$YER = [(Cu \times VOCc) + (Clu \times VOCc)] / 2000$$

Where:

YER = Year emission rate, in tons;

Cu = Coating(s) usage in gallons;

Clu = Cleanup(s) usage in gallons; and

VOCc = VOC content, in pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be based on the records in section d) of this permit.

g) Miscellaneous Requirements

(1) None.