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

12/7/2012

Certified Mail

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

Mr. Rich Buda
Eaton Corp Aurora
115 Lena Drive
Aurora, OH 44202

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

Facility ID: 1667020046
Permit Number: P0111261
Permit Type: Renewal
County: Portage

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 Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Courier. 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 "Search for Permits" link under the Permitting topic on the Programs tab. 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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Eaton Corporation Aurora has requested a Federally Enforceable Permit to Install and Operate (FEPTIO) for the following emissions units at its facility located at 115 Lena Drive in Aurora, Ohio:

EU ID	Operations, Property and/or Equipment Description
P001	Lapper 1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P003	MR11 Machine 1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P004	MR11 Machine 2 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P010	MR11 Machine 8 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P011	MR11 Machine 9 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P012	MR11 Machine 10 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P013	MR11 Machine 11 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P016	Beam Server SO1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P017	Beam Server SO2 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P018	KARG Braider K1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P020	KARG Braider K3 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P021	KARG Braider K4 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.

3. Facility Emissions and Attainment Status: Some of the adhesive materials used in the facility's manufacturing process contain ingredients which are listed as hazardous air pollutants (HAP) under Section 112(b) of the Clean Air Act. Other air contaminants emitted from these sources are particulates matter (PM) and organic compounds (OC). The facility is located in Portage County, which is in attainment for all criteria air pollutants, except particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$).

4. Source Emissions: The permittee has agreed to federally-enforceable material usage restrictions and HAP emissions limitations in order to avoid Title V permitting status. The emissions units listed above are part of the existing facility-wide operational restriction, which limits the use of adhesive materials containing methylene chloride to 10,050 gallons per rolling, 12-month period. This renewal permit will result in no change to the facility's existing individual and combined HAP emission limitations of 9.95 and 24.0 tons per rolling, 12-month period, respectively.

5. Conclusion: Compliance with the rolling, 12-month material usage restrictions and HAP emission limitations, in accordance with the associated monitoring, recordkeeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to HAP emissions. Issuance of FEPTIO #P0111261 is recommended.

6. Please provide additional notes or comments as necessary: New Best Available Technology (BAT) limits were added to comply with OAC rule 3745-31-05(A)(3) as effective 11/30/2001.

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

Pollutant	Tons Per Year
PM	2.41
OC	20.31
Individual HAP	9.95
Combined HAP	24.0

PUBLIC NOTICE
12/7/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Eaton Corp Aurora
115 Lena Ave,
Aurora, OH 44202
Portage County
FACILITY DESC.: Unlaminated Plastics Profile Shape Manufacturing
PERMIT #: P0111261
PERMIT TYPE: Renewal
PERMIT DESC: Renewal FEPTIO for 12 machines that use adhesives to apply reinforcing fiber braid to hoses and plastic tubing. New BAT limits were added to comply with OAC rule 3745-31-05(A)(3) as effective 11/30/2001.

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

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Eaton Corp Aurora

Facility ID:	1667020046
Permit Number:	P0111261
Permit Type:	Renewal
Issued:	12/7/2012
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
Eaton Corp Aurora

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Authorization

Facility ID:	1667020046
Application Number(s):	A0045327
Permit Number:	P0111261
Permit Description:	Renewal FEPTIO for 12 machines that use adhesives to apply reinforcing fiber braid to hoses and plastic tubing. New BAT limits were added to comply with OAC rule 3745-31-05(A)(3) as effective 11/30/2001.
Permit Type:	Renewal
Permit Fee:	$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	12/7/2012
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:

Eaton Corp Aurora
115 Lena Ave
Aurora, OH 44202

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0111261
Permit Description: Renewal FEPTIO for 12 machines that use adhesives to apply reinforcing fiber braid to hoses and plastic tubing. New BAT limits were added to comply with OAC rule 3745-31-05(A)(3) as effective 11/30/2001.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Lapper 1
Superseded Permit Number:	16-02478
General Permit Category and Type:	Not Applicable

Group Name: Braiding Machines

Emissions Unit ID:	**P003**
Company Equipment ID:	MR 11 Machine 1
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	MR 11 Machine 2
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	MR 11 Machine 8
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	MR 11 Machine 9
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	MR 11 Machine 10
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	MR 11 Machine 11
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	Beam Server SO1
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P017**
Company Equipment ID:	Beam Server SO2
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	Karg Braider K1
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable

Emissions Unit ID:	**P020**
Company Equipment ID:	Karg Braider K3
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	Karg Braider K4
Superseded Permit Number:	16-02478
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] 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.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) B.7.

   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) B.2. through B.6.

2. The total facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.95 tons per year, based upon a rolling, 12-month summation of the monthly individual HAP emissions, and the total facility-wide emissions of combined HAPs shall not exceed 24.0 tons per year based upon a rolling, 12-month summation of the monthly combined HAP emissions.

   These federally enforceable limitations are being established for the purpose of avoiding 40 CFR Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products and Title V major source applicability. To ensure these limits are met, the permittee has committed to meet the annual methylene chloride (MeCl) usage restriction under B.3.

3. The maximum annual facility-wide usage of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.

4. The permittee shall collect and record the following information each month for the entire facility:

   a) the company identification for each adhesive material employed;

   b) the number of gallons of each adhesive material employed;

   c) the number of gallons of all adhesive materials employed [i.e., the sum of b) for the calendar month];

   d) the amount of each individual HAP, in pounds per gallon, in each adhesive material employed;

   e) the emissions of each individual HAP, in pounds, from each adhesive material employed [i.e., b) multiplied by d)];

   f) the total individual HAP emissions, in pounds, from all the adhesive materials employed [i.e., for each individual HAP, the sum of e) from all adhesive materials];

   g) the total combined HAP emissions, in pounds, from all adhesive materials employed [i.e., the sum of f) for all HAPs from all adhesive materials];

   h) the rolling, 12-month individual HAP emissions, in tons [i.e., the total individual HAP emissions for the current calendar month, plus the total individual HAP emissions from the previous eleven calendar months];

i) the rolling, 12-month combined HAP emissions, in tons [i.e., the total combined HAP emissions for the current calendar month, plus the total combined HAP emissions from the previous eleven calendar months]; and

j) the rolling, 12-month adhesive materials usage, in gallons [i.e., the total amount of adhesive materials used for the current calendar month, plus the total amount of adhesive materials used from the previous eleven calendar months].

5. 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:

(1) 9.95 tons of any individual HAP per rolling, 12-month period;

(2) 24.0 tons of all combined HAPs per rolling, 12-month period; and

(3) 10,050 gallons of adhesive materials containing MeCl per rolling, 12-month period.

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 reporting period.

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).

6. Compliance with the facility-wide emission limitations shall be determined in accordance with the following methods:

a) <u>Emission Limitations:</u>

9.95 tons of any individual HAP per rolling, 12-month period

24.0 tons of all combined HAPs per rolling, 12-month period

<u>Applicable Compliance Method:</u>

Compliance with the HAP emission limitations identified above shall be demonstrated by the monitoring and record keeping requirements specified in B.4.

7. The federally enforceable permit-to-install and operate (FEPTIO) application was evaluated based on the actual materials and the design parameters of the facility's exhaust system as a single point source for all emissions units, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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.

   a) 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:

      (1) 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, (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):

         a. 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

         b. Short Term Exposure Limit (STEL) or the ceiling value from the 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.

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

      (3) This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" 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 MAGLC:

         TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

      (4) 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: Methylene Chloride (MeCl)
         TLV (mg/m3): 173.68
         Maximum Hourly Emission Rate (lbs/hr): 7.93
         Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 118.8
         MAGLC (ug/m3): 4,135

The permittee has demonstrated that emissions of the toxic air contaminants identified above from this facility are calculated to be less than 80% of the 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).

b) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values 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:

(1) 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 TLV than the lowest TLV previously modeled;

(2) 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, which was modeled from the initial (or last) application; and

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

If the permittee determines that the "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 a change meets the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director (appropriate Ohio EPA District Office or local air agency) 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 may require the permittee to submit a permit application for the increased emissions.

c) 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):

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

(2) the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute, ORC 3704.03(F);

(3) a copy of the computer model runs that established the predicted 1-hour maximum ground level concentration, which demonstrated the emissions units 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

(4) 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 an emissions unit or the materials applied.

d) 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.

C. Emissions Unit Terms and Conditions

1. P001, Lapper 1

Operations, Property and/or Equipment Description:

Lapper 1 - Application of reinforcing fiber braid to hoses and plastic tubing (hose reels, adhesive applicators, braiders, capstan puller and coilers).

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. None.

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

a. b)(1)c.

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 11/30/2001	0.14 lb OC/hr and 0.61 ton OC/yr. See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)d.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)e.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 pound per hour.
f.	OAC rule 3745-21-28(H)	See b)(2)f.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(1).

b. The hourly and annual organic compound (OC) emission limitations were established to reflect the maximum potential to emit for this emissions unit. Therefore, monitoring and recordkeeping requirements are not necessary to ensure compliance with these limits.

c. 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 emissions limitations/control measures no longer apply.

d. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the uncontrolled potential to emit of OC from this emissions unit is less than ten tons per year.

e. Emissions unit P001 is part of the facility-wide, federally enforceable emission limitations and operational restrictions established for the purpose of avoiding Title V applicability for hazardous air pollutants (HAP) under Sections B.2. and B.3. of this permit.

f. The total actual volatile organic compound (VOC) emissions from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility are less than 3.0 tons per rolling, 12-month period before the application of control systems and devices. Therefore, the requirements of paragraphs (B) to (G) of OAC rule 3745-21-28 shall not apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall select one of the following methods and maintain the following records for a period of five years:

a. Monthly recordkeeping method.

i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;

ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;

iii. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month; and

iv. The rolling, 12-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling, 12-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

b. Daily emissions method.

Provided total VOC emissions are less than 15.0 pounds per day, the permittee may elect to maintain the following records in lieu of the monthly records required per d)(1)a. above:

i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day;

ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day; and

iii. The total daily VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per day.

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. 3.0 tons of total actual VOC emissions per rolling, 12-month period from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

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

a. <u>Emission Limitations</u>:

0.14 lb OC/hr and 0.61 tons OC/year

<u>Applicable Compliance Method</u>:

Compliance with the hourly allowable OC emission limitation identified above shall be demonstrated by multiplying an emission factor of 0.064 lb OC/lb (Aurora Method OI-90, revision 4/18/12) by the emissions unit's maximum hose/tubing usage rate of 1500 ft/hr and the maximum MCU adhesive application rate of 0.00146 lb/ft.

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

The ton per year emission limitation was developed by multiplying the short-term allowable OC emission limitation of 0.32 lb/hr by the maximum annual operating time of 8,760 hours, and dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be demonstrated with the annual emission limitation.

b. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule

Applicable Compliance Method:

If required, compliance with the allowable opacity limitation indentified above shall be determined in accordance with OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

If required, compliance with the hourly allowable particulate emission limitation identified above shall be determined by performance testing in accordance with U.S. EPA Method 5 in 40 CFR Part 60, Appendix A.

(2) For the purpose of demonstrating compliance with less than 3.0 tons of total actual VOC emissions per rolling, 12-month period from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility per OAC rule 3745-21-28(A)(1)(a), calculations derived from Aurora Method OI-90 (revision 4/18/12) may be used to determine the percent of the reactive organic compound that becomes an integral part of the finished materials.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit (EU) Group - Braiding Machines: P003, P004, P010, P011, P012, P013, P016, P017, P018, P020 and P021

EU ID	Operations, Property and/or Equipment Description
P003	MR11 Machine 1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P004	MR11 Machine 2 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P010	MR11 Machine 8 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P011	MR11 Machine 9 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P012	MR11 Machine 10 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P013	MR11 Machine 11 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P016	Beam Server SO1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P017	Beam Server SO2 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P018	KARG Braider K1 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P020	KARG Braider K3 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.
P021	KARG Braider K4 - Hose reels, adhesive applicators, braiders, capstan puller and coilers.

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. None.

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

a. b)(1)c.

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 11/30/2001	0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P003; 0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P004; 0.12 lb OC/hr and 0.53 ton OC/yr for

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions unit P010; 0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P011; 0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P012; 0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P013; 1.66 lb OC/hr and 7.27 tons OC/yr for emissions unit P016; 1.66 lb OC/hr and 7.27 tons OC/yr for emissions unit P017; 0.15 lb OC/hr and 0.66 tons OC/yr for emissions unit P018; 0.15 lb OC/hr and 0.66 tons OC/yr for emissions unit P020; 0.15 lb OC/hr and 0.66 tons OC/yr for emissions unit P021; See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)d.
d.	OAC rule 3745-21-28(H)	See b)(2)e.

(2) Additional Terms and Conditions

a. The hourly and annual OC emission limitations were established to reflect the maximum potentials to emit for each emissions unit. Therefore, monitoring and record keeping requirements are not necessary to ensure compliance with these limits.

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 emissions limitations/control measures no longer apply.

c. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from these air contaminant sources since the uncontrolled potential to emit of OC from each emissions unit is less than ten tons per year.

d. These emissions units are part of the facility-wide, federally enforceable emission limitations and operational restrictions established for the purpose of avoiding Title V applicability for hazardous air pollutants (HAP) under Sections B.2. and B.3. of this permit.

e. The total actual volatile organic compound (VOC) emissions from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility are less than 3.0 tons per rolling, 12-month period before the application of control systems and devices. Therefore, the requirements of paragraphs (B) to (G) of OAC rule 3745-21-28 shall not apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall select one of the following methods and maintain the following records for a period of five years:

a. Monthly recordkeeping method.

i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;

ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;

iii. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month; and

iv. The rolling, 12-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling, 12-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

b. Daily emissions method.

Provided total VOC emissions are less than 15.0 pounds per day, the permittee may elect to maintain the following records in lieu of the monthly records required per d)(1)a. above:

i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day;

ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day; and

iii. The total daily VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per day.

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. 3.0 tons of total actual VOC emissions per rolling, 12-month period from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

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

f) Testing Requirements

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

a. <u>Emission Limitations:</u>

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P003

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P004

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P010

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P011

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P012

0.12 lb OC/hr and 0.53 ton OC/yr for emissions unit P013

1.66 lb OC/hr and 7.27 tons OC/yr for emissions unit P016

1.66 lb OC/hr and 7.27 tons OC/yr for emissions unit P017

0.15 lb OC/hr and 0.66 ton OC/yr for emissions unit P018

0.15 lb OC/hr and 0.66 ton OC/yr for emissions unit P020

0.15 lb OC/hr and 0.66 ton OC/yr for emissions unit P021

b. <u>Applicable Compliance Methods:</u>

Compliance with the hourly allowable OC emission limitations identified above shall be demonstrated by multiplying the worst-case emission factor of 0.447 lb OC/lb (Aurora Method OI-90, revision 4/18/12) by the adhesive's maximum application rate of 0.000672 lb/ft and the emissions unit's maximum hose/tubing usage rate listed in the following table:

Emissions Units	Maximum Hose/Tubing Rate
P003, P004, P010, P011, P012, P013	400 ft/hr
P016, P017	5535 ft/hr
P018, P020, P021	500 ft/hr

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

The ton per year emission limitations were developed by multiplying the short-term allowable OC emission limitations by the maximum annual operating time of 8,760 hours, and dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

(2) For the purpose of demonstrating compliance with less than 3.0 tons of total actual VOC emissions per rolling, 12-month period from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility per OAC rule 3745-21-28(A)(1)(a), calculations derived from Aurora Method OI-90 (revision 4/18/12) may be used to determine the percent of the reactive organic compound that becomes an integral part of the finished materials.

g) Miscellaneous Requirements

(1) None.