

Facility ID: 0335010108 Issuance type: Title V Final Permit

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit K004 and K005 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit K004 and K005 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

2. The following insignificant emissions units are located at this facility:

B002 - boiler 26; B005 - boiler 4548; B006 - air make up unit; B007 - air make up unit; B008 - boiler 7952 [PTI #03-03568]; B009 - boiler 5060; L001 - conveyORIZED degreaser (4474); L003 - conveyORIZED degreaser (4475); L004 - conveyORIZED degreaser (611); L005 - conveyORIZED degreaser (3894); L006 - conveyORIZED degreaser (3893); L007 - conveyORIZED degreaser (3895); L009 - conveyORIZED degreaser 605; L010 - conveyORIZED degreaser (4884); L011 - conveyORIZED degreaser (4555); L012 - conveyORIZED degreaser (4497); Z002 - boiler 4548; Z003 A-1 air make up unit; Z004 - A-2 air make up unit; Z005 - A-3 air make up unit; Z006 - A-4 air make up unit; Z007 - A-9 air make up unit (5013); Z008 - A-10 air make up unit (5014); Z009 - A-11 air make up unit (5015); Z010 - A-12 air make up unit (5016).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

The following insignificant emissions units are located at this facility:

B002 - boiler 26; B005 - boiler 4548; B006 - air make up unit; B007 - air make up unit; B008 - boiler 7952 [PTI #03-03568]; B009 - boiler 5060; L001 - conveyORIZED degreaser (4474); L003 - conveyORIZED degreaser (4475); L004 - conveyORIZED degreaser (611); L005 - conveyORIZED degreaser (3894); L006 - conveyORIZED degreaser (3893); L007 - conveyORIZED degreaser (3895); L009 - conveyORIZED degreaser 605; L010 - conveyORIZED degreaser (4884); L011 - conveyORIZED degreaser (4555); L012 - conveyORIZED degreaser (4497); Z002 - boiler 4548; Z003 A-1 air make up unit; Z004 - A-2 air make up unit; Z005 - A-3 air make up unit; Z006 - A-4 air make up unit; Z007 - A-9 air make up unit (5013); Z008 - A-10 air make up unit (5014); Z009 - A-11 air make up unit (5015); Z010 - A-12 air make up unit (5016).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

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b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P001 - zinc phosphate line (614); Z011 - metal forming presses; Z012 - wide strip blanking process (3852); Z013 - wrap-up presses; Z014 - automatic shot blast machine (3409); Z015 - cutoff and chamfer units; Z016 - double disc grinders; Z017 - heat treat furnace; Z020 - autoclave (4504); Z022 - secondary machining units; Z024 - welding and assembly units; Z025 - autophoretic line (4893); Z026 - tool room; Z027 - analytical test laboratory; Z029 - zinc phosphate line (4632); Z030 - zinc phosphate line (3406); Z031 - zinc phosphate line

(4875); Z047 - oil coater (7654); Z048 - oil coater (4576); Z049 - oil coater (7910); Z050 - waste water treatment plant; Z052 - rubber injection press (7517); Z053 - rubber injection press (7518); Z054 - rubber injection press (8011); Z055 - rubber injection press (8012); Z056 - rubber injection press (8013); Z057 - rubber injection press (8014); Z058 - rubber injection press (8015); Z059 - electric adhesive activation oven (8027); Z060 - small silent bloc assembly machine (52); Z061 - small silent bloc assembly machine (55); Z062 - small silent bloc assembly machine (56); Z063 - small silent bloc assembly machine (58); Z064 - small silent bloc assembly machine (60); Z065 - small silent bloc assembly machine (62); Z066 - small silent bloc assembly machine (466); Z067 - small silent bloc assembly machine (73); Z068 - small silent bloc assembly machine (300); Z070 - intermediate silent bloc assembly machine (982); Z071 - intermediate silent bloc assembly machine (981); Z072 - small silent bloc assembly machine (7704); Z073 - small silent bloc assembly machine (7493); Z074 - small silent bloc assembly machine (7494); Z075 - sta-bar assembly machine (7482); Z076 - sta-bar assembly machine (7483); Z077 - sta-bar assembly machine (7484); Z079 - sta-bar assembly machine (7591); Z080 - sta-bar assembly machine (7592); Z083 - suspension link assembly machine (7623); Z084 - suspension link assembly machine (7559); Z085 - track bar assembly machine (7509); Z086 - track bar assembly machine (7510); Z087 - track bar assembly machine (7710); Z088 - track bar assembly machine (7616); Z090 - exhaust bracket assembly machine (8009); Z091 - track bar assembly machine (7720); Z092 - track bar assembly machine (7721); Z093 - panhard rod manual assembly machine (8038); Z094 - rubber injection press (8040); Z095 - rubber injection press (8041); Z096 - rubber injection press (8042); Z097 - rubber injection press (8043); Z100 - alkaline hot water parts washers; Z109 - propane tank.

The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P001 - zinc phosphate line (614); Z011 - metal forming presses; Z012 - wide strip blanking process (3852); Z013 - wrap-up presses; Z014 - automatic shot blast machine (3409); Z015 - cutoff and chamfer units; Z016 - double disc grinders; Z017 - heat treat furnace; Z020 - autoclave (4504); Z022 - secondary machining units; Z024 - welding and assembly units; Z025 - autophoretic line (4893); Z026 - tool room; Z027 - analytical test laboratory; Z029 - zinc phosphate line (4632); Z030 - zinc phosphate line (3406); Z031 - zinc phosphate line (4875); Z047 - oil coater (7654); Z048 - oil coater (4576); Z049 - oil coater (7910); Z050 - waste water treatment plant; Z052 - rubber injection press (7517); Z053 - rubber injection press (7518); Z054 - rubber injection press (8011); Z055 - rubber injection press (8012); Z056 - rubber injection press (8013); Z057 - rubber injection press (8014); Z058 - rubber injection press (8015); Z059 - electric adhesive activation oven (8027); Z060 - small silent bloc assembly machine (52); Z061 - small silent bloc assembly machine (55); Z062 - small silent bloc assembly machine (56); Z063 - small silent bloc assembly machine (58); Z064 - small silent bloc assembly machine (60); Z065 - small silent bloc assembly machine (62); Z066 - small silent bloc assembly machine (466); Z067 - small silent bloc assembly machine (73); Z068 - small silent bloc assembly machine (300); Z070 - intermediate silent bloc assembly machine (982); Z071 - intermediate silent bloc assembly machine (981); Z072 - small silent bloc assembly machine (7704); Z073 - small silent bloc assembly machine (7493); Z074 - small silent bloc assembly machine (7494); Z075 - sta-bar assembly machine (7482); Z076 - sta-bar assembly machine (7483); Z077 - sta-bar assembly machine (7484); Z079 - sta-bar assembly machine (7591); Z080 - sta-bar assembly machine (7592); Z083 - suspension link assembly machine (7623); Z084 - suspension link assembly machine (7559); Z085 - track bar assembly machine (7509); Z086 - track bar assembly machine (7510); Z087 - track bar assembly machine (7710); Z088 - track bar assembly machine (7616); Z090 - exhaust bracket assembly machine (8009); Z091 - track bar assembly machine (7720); Z092 - track bar assembly machine (7721); Z093 - panhard rod manual assembly machine (8038); Z094 - rubber injection press (8040); Z095 - rubber injection press (8041); Z096 - rubber injection press (8042); Z097 - rubber injection press (8043); Z100 - alkaline hot water parts washers; Z109 - propane tank.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0335010108 Emissions Unit ID: K004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Inner tube adhesive application line, consisting of primer and adhesive operations, with total enclosure and regenerative thermal oxidizer (RTO)	OAC rule 3745-21-09(B)(6)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3) (PTI #03-17100, issued 5/15/07)	2.42 pounds organic compounds (OC)/hour from coating, adhesive and cleanup operations
		10.60 tons OC/year from coating, adhesive and cleanup operations
		Use of regenerative thermal oxidizer
		See A.I.2.b.

2. Additional Terms and Conditions

- a. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- b. The "Best Available Technology" (BAT) control requirements for this emission unit have been determined to be the use of a regenerative thermal oxidizer meeting a minimum control efficiency of 95% (95% destruction - 100% capture), by weight for OC. For purposes of federal enforceability a limitation on OC effectively restricts volatile organic compounds (VOC).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K004:
 - a. the name and identification of each coating, each adhesive and cleanup material employed;
 - b. the number of gallons of each coating, each adhesive and each cleanup material employed;
 - c. the organic compound content of each coating, each adhesive and each cleanup material, as applied, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings, adhesives and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that

demonstrated that the emissions unit was in compliance; and

e. the annual year-to-date organic compound emissions from all coatings, adhesives and cleanup materials (summation of A.III.2.d for each month to date from January to December).

[OAC rule 3745-77-01(C)(1) and PTI #03-17100]

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-01(C)(1), 40 CFR, Part 64.3(a) and PTI #03-17100]

3. The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the regenerative thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with the manufacturer's recommendations. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The regenerative thermal oxidizer shall not be configured to have bypass capability.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(e)]

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IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-01(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-17100]

2. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[OAC rule 3745-77-01(C)(1) and PTI #03-17100]

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V. Testing Requirements

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

a. the emission testing shall be conducted within 6 months prior to permit expiration;

b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control device efficiency requirements;

c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA;

d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and

e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

2. Compliance with the emission limitation in Section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 2.42 pound OC/hour from coating, adhesive and cleanup operations

Applicable Compliance Method: The pound/hour limit represents the emissions unit's potential to emit and was developed by combining emissions from coating and adhesive operations that occur in the emissions unit and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency) for the use of a thermal oxidizer. The emissions from coating operations was established by multiplying the maximum hourly coating usage (3.75 gal/hr), the maximum coating OC content (6.20 lbs/gallon coating). The emissions from adhesive operations was established by multiplying the maximum hourly adhesive usage (3.75 gal/hr), the maximum coating OC content (6.70 lbs/gallon coating). Compliance with the 2.42 lb OC/hr emission limitation shall be based upon the testing required in section A.V.1.

Note: Coating/adhesive operations cannot occur during cleanup operations. Cleanup operations are less than the 2.42 lbs OC/hr potential to emit for this emission unit.

- b. Emission Limitation: 10.60 tons OC/year from coating adhesive and cleanup operations)

Applicable Compliance Method: The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the hourly emission limitation compliance with the annual emission limitation shall also be shown.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0335010108 Emissions Unit ID: K004 Issuance type: Title V Final Permit

B. State Enforceable Section

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

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Inner tube adhesive application line, consisting of primer and adhesive operations, with total enclosure and regenerative thermal oxidizer (RTO)	OAC rule 3745-114-01 ORC 3704.03(F)	See A.III.1 through A.III.3

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for emission unit K004 and K005 was evaluated based on the actual materials (primer and adhesive materials) and the design parameters of the exhaust system for the emission units, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: tetrachloroethylene
 TLV (mg/m3): 339
 Maximum Hourly Emission Rate (lbs/hr): 4.82
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37.58
 MAGLC (ug/m3): 8071

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

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IV. **Reporting Requirements**

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V. **Testing Requirements**

- None

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0335010108 Emissions Unit ID: K005 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

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

- None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Outer tube adhesive application line, consisting of primer and adhesive operations, with total enclosure and regenerative thermal oxidizer (RTO)	OAC rule 3745-21-09(B)(6)	See A.I.2.a.
	OAC rule 3745-31-05(A)(5) (PTI #03-17100, issued 5/15/07)	2.42 pounds organic compounds (OC)/hour from coating, adhesive and cleanup operations
		10.60 tons OC/year from coating, adhesive and cleanup operations
		Use of regenerative thermal oxidizer
		See A.I.2.b.

2. **Additional Terms and Conditions**

- a. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- b. The "Best Available Technology" (BAT) control requirements for this emission unit have been determined to be the use of a regenerative thermal oxidizer meeting a minimum control efficiency of 95% (95% destruction - 100% capture), by weight for OC. For purposes of federal enforceability a limitation on OC effectively restricts volatile organic compounds (VOC).

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions unit K005:
 - a. the name and identification of each coating, each adhesive and cleanup material employed;
 - b. the number of gallons of each coating, each adhesive and each cleanup material employed;
 - c. the organic compound content of each coating, each adhesive and each cleanup material, as applied, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings, adhesives and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
 - e. the annual year-to-date organic compound emissions from all coatings, adhesives and cleanup materials (summation of A.III.2.d for each month to date from January to December).

[OAC rule 3745-77-01(C)(1) and PTI #03-17100]

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature within the thermal oxidizer immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-01(C)(1), 40 CFR, Part 64.3(a) and PTI #03-17100]

3. The CAM plan for this emissions unit has been developed for volatile organic compounds. The CAM performance indicator for the regenerative thermal oxidizer controlling this emissions unit is the combustion temperature, which was established in accordance with the manufacturer's recommendations. When the combustion temperature shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The regenerative thermal oxidizer shall not be configured to have bypass capability.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(e)]

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IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-01(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-17100]

2. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[OAC rule 3745-77-01(C)(1) and PTI #03-17100]

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V. Testing Requirements

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

- a. the emission testing shall be conducted within 6 months prior to permit expiration;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control device efficiency requirements;
- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA;
- d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
- e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

2. Compliance with the emission limitation in Section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation: 2.42 pound OC/hour from coating, adhesive and cleanup operations
- Applicable Compliance Method: The pound/hour limit represents the emissions unit's potential to emit and was developed by combining emissions from coating and adhesive operations that occur in the emissions unit and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency) for the use of a thermal oxidizer. The emissions from coating operations was established by multiplying the maximum hourly coating usage (3.75 gal/hr), the maximum coating OC content (6.20 lbs/gallon coating). The emissions from adhesive operations was established by multiplying the maximum hourly adhesive usage (3.75 gal/hr), the maximum coating OC content (6.70 lbs/gallon coating) Compliance with the 2.42 lb OC/hr emission limitation shall be based upon the testing required in section A.V.1.
- Note: Coating/adhesive operations cannot occur during cleanup operations. Cleanup operations are less than the 2.42 lbs OC/hr potential to emit for this emission unit.
- b. Emission Limitation: 10.60 tons OC/year from coating adhesive and cleanup operations)
- Applicable Compliance Method: The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the hourly emission limitation compliance with the annual emission limitation shall also be shown.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0335010108 Emissions Unit ID: K005 Issuance type: Title V Final Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Outer tube adhesive application line, consisting of primer and adhesive operations, with total enclosure and regenerative thermal oxidizer (RTO)	OAC rule 3745-114-01 ORC 3704.03(F)	See A.III.1 through A.III.3

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emission unit K004 and K005 was evaluated based on the actual materials (primer and adhesive materials) and the design parameters of the exhaust system for the emission units, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: tetrachloroethylene
 TLV (mg/m3): 339
 Maximum Hourly Emission Rate (lbs/hr): 4.82
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37.58
 MAGLC (ug/m3): 8071

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

2. Physical changes to or changes in the method of operation of the emission unit(s) after installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the

change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[OAC rule 3745-77-07(C)(1) and PTI #03-17100]

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None