



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
SANDUSKY COUNTY
Application No: 03-10819

CERTIFIED MAIL

DATE: 8/17/2000

Aeroquip INOAC
Glen Young
1410 Motor Dr
Fremont, OH 43420

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/17/2000
Effective Date: 8/17/2000**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-10819

Application Number: **03-10819**
APS Premise Number: **0372030199**
Permit Fee: **\$800**
Name of Facility: **Aeroquip INOAC**
Person to Contact: **Glen Young**
Address: **1410 Motor Dr
Fremont, OH 43420**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1410 Motor Dr
Fremont, OHIO**

Description of modification:

Modification of PTI 03-10819, issued 4/22/98, to consolidate incorrectly permitted paint booths and to assign designation of paint mix operations for paintline three.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Aeroquip INOAC** located in **SANDUSKY** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number

R009
(Modification)

R009
(Modification)
(Cont'd)

R011
(Modification)

R018
(New)

P019
(New)

P018
(New)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Source Identification Description

Primer spray booth No. 1 - Modification to allow increase in paint usage	Clearcoat spray booth No. 3 - (Modification to allow increase in paint usage)
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P008
(Modification)

Primer oven with flash and cooling zone

Paint mix operations

Color spray booth No. 5 with IR flash zone

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
Clearcoat oven with flash zone - (Modification to allow increase in paint usage)	<p style="text-align: center;"><u>BAT Determination</u></p> <p>Compliance with the terms and conditions of this permit, Air Toxics Policy and the use of water wash system and the RTO</p>	<p>Compliance with the terms and conditions of this permit, Air Toxics Policy and the use of water wash system and the RTO</p>	<p>Compliance with the terms and conditions of this permit, Air Toxics Policy and the use of water wash system and the RTO</p>	<p>Compliance with the terms and conditions of this permit, Air Toxics Policy and systems and the RTO</p>
				<p>Compliance with the terms and conditions of this permit, Air Toxics Policy and system and RTO</p>

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u> and the RTO	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				3745-17-11(B)
			3745-21-07(G)(2)	
				3745-17-07(A)
		Applicable Federal & <u>OAC Rules</u>	3745-17-11(B)	
			3745-17-07(A)	3745-31-05
		3745-31-05		
			3745-31-05	

Compliance with the terms and conditions of this permit, Air Toxics Policy and system

3745-21-07(G)(2)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-17-11(B)				TPY
3745-17-07(A)			Permit Allowable Mass Emissions and/or Control/Usage Requirements	*
3745-31-05			<u>Coating and Cleanup Operations</u> Organic compounds (OC): 1.94 pounds/hour and 7.76 TPY	
		3745-21-07(G)(1)	Use of a regenerative thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction efficiency	
	3745-21-07(G)(1)			
	3745-31-05		Particulate emissions (PE): 0.068 pound/hour and 0.28 TPY	
3745-21-07(G)(2)			0 percent opacity as a 6-minute average	
3745-31-05			<u>Combustion Emissions from RTO**</u> Nitrogen oxides (NO _x): 0.62 pound/hour and 2.73	

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	* PE: 0.096 *pound/hour and 0.38 TPY	efficiency PE: 0.021 pound/hour and 0.09 TPY	<u>Coating/Cleanup Operations</u> OC: 0.37 pound/hour and 1.48 TPY	thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction efficiency and a 90 percent OC destruction efficiency
<u>Coating/Cleanup operations</u>	0 percent opacity as a 6-minute average	0 percent opacity as a 6-minute average	Use of a regenerative thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction efficiency	<u>Combustion Emissions from Oven</u> NO _x : 0.57 pound/hour and 2.29 TPY
OC: 1.96 pounds/hour and 7.88 TPY	<u>Combustion Emissions from RTO**</u> NO _x : 0.62 pound/hour and 2.73 TPY	<u>Combustion Emissions from RTO**</u> NO _x : 0.62 pound/hour and 2.73 TPY		
Use of a regenerative thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction efficiency	*	*	<u>Combustion Emissions from Oven</u> NO _x : 0.15 pound/hour and 0.61 TPY	<u>Combustion Emissions from RTO**</u> NO _x : 0.62 pound/hour and 2.73 TPY
	*	<u>Mixing/Storage Operations</u> OC: 0.37 pound/hour and 0.33 TPY	<u>Combustion Emissions from RTO**</u> NO _x : 0.62 pound/hour and 2.73 TPY	*
	<u>Coating/Cleanup Operations</u> OC: 3.53 pounds/hour and 14.16 TPY	Use of a regenerative thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction efficiency	*	
	Use of a regenerative thermal oxidizer (RTO) with a 100 percent OC capture efficiency and a 90 percent OC destruction	<u>Combustion Emissions from RTO**</u> NO _x : 0.62 pound/hour and 2.73 TPY	<u>Coating/Cleanup Operations</u> OC: 0.38 pound/hour and 1.51 TPY	
		*	Use of a regenerative	

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- * The emissions limits based on these applicable rules are less stringent than the limits established pursuant to OAC rules 3745-31-05.
- * Each emissions unit is vented to a common RTO. The limits of 0.62 pound/hour and 2.73 TPY represent the total emissions from the RTO.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	33.2***
PE	0.74
NO _x	5.63

***NOTE: Net emissions decrease of 42.6 tons OC per year for emissions units P008, R009, and R011 as a result of this modification.

PE and NO_x emissions limits were never established in past permits for the modified emissions units.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

Aeroquip Inoac in Fremont Ohio has requested, through PTI No. 03-10819, to modify their paint line No. 3 which will decrease emissions by 42.605 tons per year. This modification consist of the modification of emissions units R009, R011 and P008, the addition of R018, P018, and P019 and a regenerative thermal oxidizer (RTO).

A. Applicable Emission Limitations and/or Control Requirements

1. The hourly NO_x emission limitations for emission units P008, P019, and the regenerative thermal oxidizer are based on each emissions unit's potential to emit: therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

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B. Operational Restrictions

1. This permit allows for the use of the coatings and cleanup materials in emissions units R009, R011, R018, P008, P018, and P019 specified by the permittee in PTI application number 03-10819. In conjunction with the best available technology requirements of OAC rule 3745-31-05 the VOC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the BREEZE AIR ISCST3, v. 2.03 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

Pollutant	TLV (mg/m ³)	Emissions Rate (lbs/hr)	Modeled Ground Level Concentration (ug/m ³)	Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m ³)
Ethyl Benzene	434	0.37	43.7	10,333.00
methyl ethyl ketone	590	2.54	43.7	14,048.00
Xylene 434	0.06		43.7	10,333.00
Toluene	188	0.26	43.7	4,476.00
Methanol	262	0.01	43.7	6,238.00

Any of the following changes may be deemed a "modification" to the emissions units and, as such,

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prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modification to PTI number 03-10819 and the operating permit:

- a. any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g. increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of any MAGLC specified in the above table; and,
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions units are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.
 3. Emission units R009, R011, R018, P018, P019 and P008 shall be totally enclosed such that OC emissions are captured and contained for discharge through the RTO. Compliance with the following criteria, identified by USEPA Method 204, shall satisfy the total enclosure requirement:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and,
 - e. all OC emissions must be captured and contained for discharge through a control device.
 4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated emissions units R009, R011, R018, P018, P019, and P008 were in compliance, whenever these emissions units are in operation.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when emissions units R009, R011, R018, P018, P019, and P008 are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions units were in operation; and,
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions units were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information monthly for the purpose of determining annual organic compound emissions:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total controlled organic compound emission rate for all coatings and cleanup materials, in pounds or tons 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. total controlled organic compound emission rate for all coatings and cleanup materials, for the calendar year-to-date, in tons per year.
 3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure.

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The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

4. The permittee shall record and maintain the following information on a daily basis:
 - a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and,
 - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
5. All records, as well as any supporting analysis, shall be retained in the company's files for a period of not less than five years, such records may be maintained in computerized form, and shall be made available to the Director of any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify 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.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. The permittee shall submit required reports in the following manner:

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

4. The actual annual emissions data for emissions unit R009, R011, R018, P018, P019, and P008 shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

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5. The compliance status of emissions units R009, R011, R018, P018, P019, and P008 shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C)(5).

E. Compliance Methods and Testing Requirements

1. Compliance Methods Requirements

Compliance with the emission limitation(s) in Section A.1 and the Air Emission Summary page of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Unit R009

i. Emission Limitation

1.94 pounds OC/hr

Applicable Compliance Method

Compliance shall be determined by emissions testing as specified in section E.3 and the recordkeeping specified in section C.

ii. Emission Limitation

7.76 TPY OC

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C.

iii. Emission Limitation

0.068 pound PE/hr

Applicable Compliance Method

Compliance with the emissions limitations may be determined in accordance with the following equation: $PE = \text{hourly gallon usage rate} \times \text{percent overspray} \times \text{percent solid by weight} \times (1 - \text{control efficiency}) \times \text{coating density}$

If required by the Ohio EPA, compliance shall be determined by testing utilizing Method 5 of 40 CFR Part 60 Appendix A.

iv. Emission Limitation

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0.28 TPY PE

Applicable Compliance Method

The TPY limitations were developed by multiplying the pounds/hour limitations by the maximum operating schedule of 8030 hours/year and dividing by 2000 pounds/ton.

v. Emission Limitation

0 percent opacity as a 6 minute average

Applicable Compliance Method

Compliance with the visible emissions limitations shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60 Appendix A.

b. Emissions Unit R011

i. Emission Limitation

1.96 pounds OC/hr

Applicable Compliance Method

Compliance shall be determined by emissions testing as specified in section E.3 and the recordkeeping specified in section C.

ii. Emission Limitation

7.88 TPY OC

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C.

iii. Emission Limitation

0.096 pound PE/hr

Applicable Compliance Method

Compliance with the emissions limitations may be determined in accordance with

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the following equation: $PE = \text{hourly gallon usage rate} \times \text{percent overspray} \times \text{percent solid by weight} \times (1 - \text{control efficiency}) \times \text{coating density}$

If required by the Ohio EPA, compliance shall be determined by testing utilizing Method 5 of 40 CFR Part 60 Appendix A.

iv. Emission Limitation

0.38 TPY PE

Applicable Compliance Method

The TPY limitations were developed by multiplying the pounds/hour limitations by the maximum operating schedule of 8030 hours/year and dividing by 2000 pounds/ton.

v. Emission Limitation

0 percent opacity as a 6 minute average

Applicable Compliance Method

Compliance with the visible emissions limitations shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60 Appendix A.

c. Emissions Unit R018

i. Emission Limitation

3.53 pounds OC/hr

Applicable Compliance Method

Compliance shall be determined by emissions testing as specified in section E.3 and the recordkeeping specified in section C.

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ii. Emission Limitation

14.16 TPY OC

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C.

iii. Emission Limitation

0.021 pound PE/hr

Applicable Compliance Method

Compliance with the emissions limitations may be determined in accordance with the following equation: $PE = \text{hourly gallon usage rate} \times \text{percent overspray} \times \text{percent solid by weight} \times (1 - \text{control efficiency}) \times \text{coating density}$

If required by the Ohio EPA, compliance shall be determined by testing utilizing Method 5 of 40 CFR Part 60 Appendix A.

iv. Emission Limitation

0.09 TPY PE

Applicable Compliance Method

The TPY limitations were developed by multiplying the pounds/hour limitations by the maximum operating schedule of 8030 hours/year and dividing by 2000 pounds/ton.

v. Emission Limitation

0 percent opacity as a 6 minute average

Applicable Compliance Method

Compliance with the visible emissions limitations shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60 Appendix A.

d. Emissions Unit P018

i. Emission Limitation

0.37 pound OC/hr

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C. Specifically, by the following equation shall be used: the results from recordkeeping requirements in term C.2.d \div hours of operation per month x 1 percent.

ii. Emission Limitation

0.33 TPY OC

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C. Specifically, by following equation shall be used: the results from recordkeeping requirements in term C.2.e x 1 percent.

e. Emissions unit P019

i. Emission Limitation

0.37 pound OC/hr

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C. For purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booth (R009), the permittee shall utilize a value of 80 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted from the spray booth. The remaining 20 percent of the organic compounds employed in spray booth shall be considered to be the emissions for this emission unit. This split of organic compound emissions between this emissions unit and the associated spray booth is based upon AP42, Section 4.2.2.14, 1994 edition.

ii. Emission Limitation

1.48 TPY OC

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Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C.

iii. Emission Limitation

0.15 pound NO_x/hour

Applicable Compliance Method

See term A.1 above.

iv. Emission Limitation

0.61 TPY NO_x

Applicable Compliance Method

See Additional Special Term and Condition A.1 above.

f. Emissions Unit P008

i. Emission Limitation

0.38 pound OC/hr

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C. For purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booth (R011), the permittee shall utilize a value of 80 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted from the spray booth. The remaining 20 percent of the organic compounds employed in spray booth shall be considered to be the emissions for this emission unit. This split of organic compound emissions between this emissions unit and the associated spray booth is based upon AP42, Section

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4.2.2.14, 1994 edition.

ii. Emission Limitation

1.51 TPY OC

Applicable Compliance Method

Compliance shall be determined by the recordkeeping specified in section C.

iii. Emission Limitation

0.57 pound NO_x/hour

Applicable Compliance Method

See term A.1 above.

iv. Emission Limitation

2.29 TPY NO_x

Applicable Compliance Method

See Term A.1 above.

g. Regenerative Thermal Oxidizer

i. Emission Limitation

0.62 pound NO_x/hour

Applicable Compliance Method

See term A.1 above.

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ii. Emission Limitation

2.73 TPY NO_x

Applicable Compliance Method

See term A.1 above.

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

3. Emission Testing Requirements

The permittee shall conduct, or have conducted, emission testing for emissions units R009, R011, R018, P018, P019, and P008 in accordance with the following requirements:

- a. the emission testing shall be conducted within 90 days after the completion of the modification but not later than 180 days after initial startup;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates, capture efficiencies and control efficiency limitations for organic compounds;
- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 18 of 40 CFR Part 60, Appendix A, Method 25 of 40 CFR Part 60, Appendix A, or Method 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 units are operating at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office; and,
- e. the overall control 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,

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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 Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 units and the testing procedures provide a valid characterization of the emissions from the emissions units 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 Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements contained in the permit to install (application number 03-2987) issued for emissions units R009, R011, and P008 on June 19, 1991: A1, C2, and D4.