



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
SANDUSKY COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 03-13836**

**DATE: 5/8/2003**

Eaton INOAC  
Shawn Reinhart  
1410 Motor Dr  
Fremont, OH 43420

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 5/8/2003  
Effective Date: 5/8/2003**

**FINAL PERMIT TO INSTALL 03-13836**

Application Number: 03-13836  
APS Premise Number: 0372030199  
Permit Fee: **\$700**  
Name of Facility: Eaton INOAC  
Person to Contact: Shawn Reinhart  
Address: 1410 Motor Dr  
Fremont, OH 43420

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1410 Motor Dr  
Fremont, Ohio**

Description of proposed emissions unit(s):

**Modification of Paint Line 4, installation of P021 and R003.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

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

## 5. Severability Clause

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

## 6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

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

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## 10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

## 11. 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.

## 12. Air Pollution Nuisance

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

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required 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 appropriate Ohio EPA District Office or local air agency. 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.)

### **3. Permit Transfers**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

### **4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

## **5. Construction of New Sources(s)**

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

## **6. 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.

## **7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **8. 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC               | 315.9                |
| VOC              | 285.9                |
| PE               | 14.6                 |

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 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>                |
|---|--------------------------------------|---|
| P021 - Paint blending operations.             | OAC rule 3745-31-05 (A)(3)           | 185.04 lbs organic compounds (OC)/day<br>11.3 tons OC/yr (see A.I.2.a.) |
|   |                                      | 82.80 lbs volatile organic compounds (VOC)/day (see A.I.2.a.)           |
|   |                                      | See A.I.2.b.  |
|   | OAC rule 3745-31-05 (D)              | 5.0 tons VOC per rolling, 365-day period<br>(See A.I.2.a & A.I.2.c.)    |
|   | OAC rule 3745-21-07 (G)              | See A.I.2.d.  |

**2. Additional Terms and Conditions**

- 2.a The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(6). The organic compound limitations represent OC emissions which are not defined as VOC (i.e. OCs are not inclusive of VOCs).
- 2.b The requirements of this rule also include compliance with OAC rule 3745-31-05 (D).
- 2.c Eaton Inoac has requested a federally enforceable emission limitation for the Paint Blending operation of 5.0 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Blending is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.
- 2.d OAC rule 3745-21-07 (G) is not applicable to this emissions unit because the emissions unit does not employ, apply, evaporate, or dry any liquid organic material.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification of each blending operation performed (i.e., batch mixing, filling, or tank cleaning).
  - b. The number of hours each blending operation was performed.
  - c. The VOC and OC emission factors for each blending operation, as determined by the paint supplier.
  - d. The VOC and OC emission rates of each blending operation, in pounds per day, (summation of [b. x c.], for all blending operations).
  - e. The annual, year to date OC emission rate, in tons, from the paint blending operations (summation of d. for each calendar day to date from January to December).
  - d. The annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the following daily emission limitations:
  - a. 185.04 pounds OC/day, and/or
  - b. 82.80 pounds VOC/day.

The permittee shall include in the report the actual emissions for each such day.

2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitation of 11.3 tons OC/yr. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year. If no deviations occur during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that year.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms

Emissions Unit ID: P021

and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 5.0 tons VOC per rolling, 365-day period.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
185.04 lbs OC/day and 11.3 tons OC/yr

**Applicable Compliance Method:**

The record keeping requirements specified in Section A.III.1. of this permit shall be used to determine compliance with the daily and annual OC emission limitations.

- b. **Emission Limitation:**  
82.80 lbs VOC/day and 5.0 tons VOC per rolling, 365-day period

**Applicable Compliance Method:**

The record keeping requirements specified in Section A.III.1. of this permit shall be used to determine compliance with the daily and annual VOC emission limitations.

## VI. Miscellaneous Requirements

None

Issued: 5/8/2003

**B. State Only Enforceable Section**

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

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| P021 - Paint blending operations.             | None                                 | See B.III.   |

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

| AIR TOXIC            | TLV (mg/m <sup>3</sup> ) | MAGLC (ug/m <sup>3</sup> ) | Maximum 1-Hour Average Concentration (ug/m <sup>3</sup> ) |
|----------------------|--------------------------|----------------------------|---|
| Ethylbenzene         | 434.73                   | 10337.91                   | 2293.58   |
| Styrene              | 85.20                    | 2028.63                    | 1.66  |
| Methyl Propyl Ketone | 704.87                   | 16782.55                   | 2293.58   |

**Issued**

Emissions Unit ID: P021

|                                   |         |          |         |
|-----------------------------------|---------|----------|---------|
| Methyl Isobutyl Ketone            | 204.83  | 4876.81  | 2293.58 |
| Mesitylene                        | 122.89  | 2926.04  | 2293.58 |
| Diisobutyl Ketone                 | 145.43  | 3462.61  | 2293.58 |
| Toluene                           | 188.40  | 4485.83  | 2293.58 |
| Ketohexamethylene (Cyclohexanone) | 96.30   | 2292.82  | 126.90  |
| Isobutyl Acetate                  | 712.64  | 16967.57 | 2293.58 |
| Methyl Amyl Ketone                | 233.50  | 5559.45  | 2293.58 |
| n-Butyl Acetate                   | 712.64  | 16967.57 | 2293.58 |
| Isoamyl Acetate                   | 266.26  | 6339.47  | 2293.58 |
| Xylene                            | 434.19  | 10337.91 | 2293.58 |
| Ethyl Acetate                     | 1441.31 | 34316.88 | 2293.58 |
| n-Heptane                         | 1639.26 | 39030.09 | 2293.58 |
| Trimethylbenzene                  | 122.89  | 2926.04  | 2293.58 |
| n-Amyl Acetate                    | 266.26  | 6339.47  | 2293.58 |
| Ethyl Alcohol                     | 1884.25 | 44863.18 | 2293.58 |
| Methyl Alcohol                    | 262.09  | 6240.14  | 2293.58 |
| Isopropyl Alcohol                 | 983.07  | 23406.37 | 2293.58 |
| n-Butyl Alcohol                   | 151.57  | 3608.92  | 2293.58 |
| Isobutyl Alcohol                  | 151.57  | 3608.92  | 2293.58 |
| Methyl Ethyl Ketone               | 589.78  | 14042.26 | 2293.58 |
| Stoddard Solvent                  | 572.60  | 13633.27 | 2293.58 |
| Hexamethylene Diisocyanate        | 0.03    | 0.82     | 0.81    |
| 1,2,4-Trimethylbenzene            | 122.89  | 2926.04  | 2293.58 |
| Isopropylbenzene                  | 245.79  | 5852.08  | 2293.58 |

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. 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.

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/Requirements</u> |                         |
|---|--------------------------------------|-------------------------|
| K004 - Paint Line #4.<br>Modification to PTI #03-8365, issued 6/5/96.<br>The modification involves repermitting the coating line as one emissions unit. |                                      | OAC rule 3745-17-11 (B) |
|   | OAC rule 3745-31-05 (A)(3)           | OAC rule 3745-18-06 (A) |
|   |                                      | OAC rule 3745-23-06 (B) |
|   |                                      |                         |
|   | OAC rule 3745-31-05 (D)              |                         |
|   |                                      |                         |
|   | OAC rule 3745-21-07 (G)              |                         |
|   | OAC rule 3745-21-07 (G)(1)           |                         |
|   | OAC rule 3745-17-07 (A)              |                         |
|   | OAC rule 3745-17-10 (B)              |                         |

**Issued**

Emissions Unit ID: K004

Applicable Emissions  
Limitations/Control  
Measures

127.50 lbs organic  
compounds (OC)/hr  
301.2 tons OC/yr (see  
A.I.2.b.)

117.00 lbs volatile organic  
compounds (VOC)/hr (see  
A.I.2.b.)

6.10 lbs particulate emissions  
(PE)/hr  
14.5 tons PE/yr

Visible PE shall not exceed  
0% opacity, as a six-minute  
average

See A.I.2.c. and A.I.2.d.

277.8 tons VOC per rolling,  
365-day period  
(see A.I.2.b & A.I.2.e.)

See A.II.1.

See A.I.2.f.

See A.I.2.g.

0.020 lb PE/mmBtu

See A.I.2.g.

See A.I.2.h.

See A.I.2.i.

## 2. Additional Terms and Conditions

**2.a** Paint Line #4 includes the following operations:

a. paint mixing operation;

- b. primer spray booth with water curtain;
  - c. indirect-fired primer curing oven;
  - d. color spray booth with water curtain;
  - e. clearcoat spray booth with water curtain;
  - f. indirect-fired clearcoat curing oven; and
  - g. paint cleanup operation.
- 2.b** Organic compound emissions are inclusive of volatile organic compound emissions.
- 2.c** The requirements of this rule also include compliance with the requirements of OAC rules: 3745-31-05 (D) and 3745-17-10 (B).
- 2.d** All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM<sub>10</sub>).
- 2.e** Eaton Inoac has requested a federally enforceable emission limitation for Paint Line #4 of 277.8 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Line #4 is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.
- 2.f** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). Based on previous stack testing, it has been determined that each cure oven contributes less than 0.625 pounds OC/hour to an overall hourly emission rate of 117.00 pounds for the entire paint line #4. Based on the maximum potential hourly contribution of each cure oven to the overall hourly emission rate, each cure oven is in compliance with the 3 pounds OC/hour and 15 pounds OC/day emission limitations specified in OAC rule 3745-21-07 (G)(1).
- 2.g** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.h** The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06 (A).

- 2.i** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B), by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit.

## **II. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in the paint booths and cleanup operation associated with this emissions unit is prohibited.
2. The permittee shall operate the water curtain system(s) whenever the paint booth(s) associated with this emissions unit is/are in operation.

## **III. Monitoring and/or Recordkeeping Requirements**

1. In order to demonstrate compliance with condition A.II.1, the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in the paint booths and cleanup operation associated with this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5).
2. The permittee shall maintain daily records that document any time periods when the water curtain system(s) was/were not in service when the paint booth(s) associated with this emission unit was/were in operation.
3. The permittee shall collect and record the following information for each day for OC and VOC emissions from the coating operation:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC and OC contents of each coating and cleanup material, in pounds per gallon.
  - d. The VOC and OC emission rates from the coating operation, in pounds per day, (summation of [b. x c.], for all coatings and cleanup materials employed).

- e. The total number of hours the emissions unit was in operation.
- f. The average, hourly VOC and OC emission rates from the coating operations (d./e.), in pounds per hour (average).

- g. The annual, year to date OC emission rate, in tons, from the coating operation (summation of d. for OC for each calendar day to date from January to December).
- h. The annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall collect and record the following information for each day for the particulate emissions from the paint booths associated with the coating operation:
  - a. The company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The solid contents of each coating, in pounds per gallon.
  - d. The total, daily coating solid usage rate, in pounds per day, (summation of [b. x c.], for all coatings employed).
  - e. The daily particulate emission rate from the coating operation, employing the following equation:
 
$$E = \text{particulate emission rate (lbs/day)}$$

$$E = (\text{coating solid usage rate [d.]}) (1 - TE) (1 - CE)$$

where,

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 15 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)
  - f. The total number of hours the emissions unit was in operation.
  - g. The hourly particulate emission rate from the coating operation (e./f.), in pounds per hour.
  - h. The annual, year to date particulate emission rate, in tons, from the coating operation

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(summation of e. for each calendar day to date from January to December).

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify each day during which the average hourly emissions exceeded any of the following:
  - a. 127.50 pounds OC/hour;
  - b. 117.00 pounds VOC/hour;
  - c. 6.10 pounds PE/hour.

The permittee shall include in the report the actual average hourly emissions for each such day.

4. The permittee shall submit annual reports which identify any deviations from the following annual emissions limitations:
  - a. 301.2 tons OC/year;
  - b. 14.5 tons PE/year.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year. If no deviations occur during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that year.

5. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 277.8 tons VOC per rolling, 365-day period.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
127.50 lbs OC/hr and 301.2 tons OC/yr
- Applicable Compliance Method:**  
The record keeping requirements specified in Section A.III.3. of this permit shall be used to determine compliance with the hourly and annual OC emission limitations.
- b. **Emission Limitation:**  
6.10 lbs PE/hr and 14.5 tons PE/yr
- Applicable Compliance Method:**  
The record keeping requirements specified in Section A.III.4. of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.
- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.
- c. **Emission Limitation:**  
Visible PE shall not exceed 0% opacity, as a six-minute average
- Applicable Compliance Method:**  
If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.
- d. **Emission Limitation:**  
117.00 lbs VOC/hr and 277.8 tons VOC per rolling, 365-day period
- Applicable Compliance Method:**  
The record keeping requirements specified in Section A.III.3. of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations.
- e. **Emission Limitation:**  
0.020 lb PE/mmBtu
- Applicable Compliance Method:**  
The permittee may demonstrate compliance with this emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr)

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If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

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Emissions Unit ID: K004

**VI. Miscellaneous Requirements**

1. Paint Line #4 was originally permitted as emissions units P004, P005, R006, R007, and R008 under PTI #03-8365, issued 6/5/96.

**B. State Only Enforceable Section**

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

1. The specific operations(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 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> |
|--|--------------------------------------|--|
| K004 -Paint Line #4.<br>Modification to PTI #03-8365, issued 6/5/96.<br>The modification involves repermitting the coating line as one emissions unit. | None                                 | See B.III.   |

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

**AIR TOXIC**

Emissions Unit ID: K004

|                                   | TLV (mg/m3) | MAGLC (ug/m3) | Maximum 1-Hour Average Concentration (ug/m3) |
|-----------------------------------|-------------|---------------|--|
| Ethylbenzene                      | 434.73      | 10337.91      | 2293.58                                      |
| Styrene                           | 85.20       | 2028.63       | 1.66   |
| Methyl Propyl Ketone              | 704.87      | 16782.55      | 2293.58                                      |
| Methyl Isobutyl Ketone            | 204.83      | 4876.81       | 2293.58                                      |
| Mesitylene                        | 122.89      | 2926.04       | 2293.58                                      |
| Diisobutyl Ketone                 | 145.43      | 3462.61       | 2293.58                                      |
| Toluene                           | 188.40      | 4485.83       | 2293.58                                      |
| Ketohexamethylene (Cyclohexanone) | 96.30       | 2292.82       | 126.90                                       |
| Isobutyl Acetate                  | 712.64      | 16967.57      | 2293.58                                      |
| Methyl Amyl Ketone                | 233.50      | 5559.45       | 2293.58                                      |
| n-Butyl Acetate                   | 712.64      | 16967.57      | 2293.58                                      |
| Isoamyl Acetate                   | 266.26      | 6339.47       | 2293.58                                      |
| Xylene                            | 434.19      | 10337.91      | 2293.58                                      |
| Ethyl Acetate                     | 1441.31     | 34316.88      | 2293.58                                      |
| n-Heptane                         | 1639.26     | 39030.09      | 2293.58                                      |
| Trimethylbenzene                  | 122.89      | 2926.04       | 2293.58                                      |
| n-Amyl Acetate                    | 266.26      | 6339.47       | 2293.58                                      |
| Ethyl Alcohol                     | 1884.25     | 44863.18      | 2293.58                                      |
| Methyl Alcohol                    | 262.09      | 6240.14       | 2293.58                                      |
| Isopropyl Alcohol                 | 983.07      | 23406.37      | 2293.58                                      |
| n-Butyl Alcohol                   | 151.57      | 3608.92       | 2293.58                                      |
| Isobutyl Alcohol                  | 151.57      | 3608.92       | 2293.58                                      |
| Methyl Ethyl Ketone               | 589.78      | 14042.26      | 2293.58                                      |
| Stoddard Solvent                  | 572.60      | 13633.27      | 2293.58                                      |
| Hexamethylene Diisocyanate        | 0.03        | 0.82          | 0.81   |
| 1,2,4-Trimethylbenzene            | 122.89      | 2926.04       | 2293.58                                      |
| Isopropylbenzene                  | 245.79      | 5852.08       | 2293.58                                      |

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in

an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. 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.

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>  |
|---|--------------------------------------|---|
| K005 - Paint engineering lab with dry filtration. | OAC rule 3745-31-05 (A)(3)           | 26.40 lbs organic compounds (OC)/day<br>3.4 tons OC/yr<br><br>23.52 lbs volatile organic compounds (VOC)/day<br><br>0.04 lb particulate emissions (PE)/hr<br>0.1 ton PE/yr<br><br>Visible PE shall not exceed 0% opacity, as a six-minute average<br><br>See A.I.2.a., A.I.2.b., and A.I.2.c. |
|   | OAC rule 3745-31-05 (D)              | 3.1 tons VOC per rolling, 365-day period (See A.I.2.c & A.I.2.d)  |
|   | OAC rule 3745-21-07 (G)              | See A.II.1.   |
|   | OAC rule 3745-17-07 (A)              | See A.I.2.e.  |
|   | OAC rule 3745-17-11 (B)              | See A.I.2.e.  |

**2. Additional Terms and Conditions**

Emissions Unit ID: K005

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b** All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM<sub>10</sub>).
- 2.c** The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(6). The organic compound limitations represent OC emissions which are not defined as VOC (i.e. OCs are not inclusive of VOCs).
- 2.d** Eaton Inoac has requested a federally enforceable emission limitation for the paint blending operation of 3.1 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.
- 2.e** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

## II. Operational Restrictions

- The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.
- The permittee shall operate the dry filtration system whenever the unit is in operation.
- Annual VOC emissions from this emissions unit shall not exceed 3.1 tons based upon a rolling, 365-day summation of the daily VOC emission rates.

To ensure federal enforceability during the first 365 calendar days of operation, the permittee shall not exceed the VOC emission rates specified in the following table:

### Maximum Allowable Cumulative OC Emission Rates (tons)

| <u>Month(s)</u> | <u>VOC Emissions</u> |
|-----------------|----------------------|
| 1-1             | 0.3                  |
| 1-2             | 0.6                  |
| 1-3             | 0.9                  |
| 1-4             | 1.2                  |
| 1-5             | 1.5                  |
| 1-6             | 1.8                  |
| 1-7             | 2.1                  |
| 1-8             | 2.3                  |
| 1-9             | 2.5                  |
| 1-10            | 2.7                  |
| 1-11            | 2.9                  |

|      |     |
|------|-----|
| 1-12 | 3.1 |
|------|-----|

After the first 12 calendar months of operation, compliance with the annual VOC emission limitation of 3.1 tons shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

### III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with condition A.II.1, the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in the paint booths and cleanup operation associated with this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emission unit was in operation.
3. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The VOC and OC contents of each coating and cleanup material, in pounds per gallon.
  - d. The VOC and OC emission rates from the coating operation, in pounds per day, (summation of [b. x c.], for all coatings and cleanup materials employed).
  - e. The annual year to date OC emission rate, in tons, from the coating operation (summation of d. for each calendar day to date from January to December).
  - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per year; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, in tons based on a rolling, 365-day summation of the daily VOC

emission rates.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall collect and record the following information for each day for the particulate emissions from the paint booths associated with the coating operation:
  - a. The company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The solid contents of each coating, in pounds per gallon.
  - d. The total, daily coating solid usage rate, in pounds per day, (summation of [b. x c.], for all coatings employed).
  - e. The daily particulate emission rate from the coating operation, employing the following equation:
 
$$E = \text{particulate emission rate (lbs/day)}$$

$$E = (\text{coating solid usage rate [d.]}) (1 - TE) (1 - CE)$$
 where,
 

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 15 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)
  - f. The total number of hours the emissions unit was in operation.
  - g. The hourly particulate emission rate from the coating operation (e./f.), in pounds per hour.
  - h. The annual, year to date particulate emission rate, in tons, from the coating operation (summation of e. for each calendar day to date from January to December).

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in

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writing of any daily record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the following emission limitations:
  - a. 26.40 pounds OC/day;
  - b. 23.52 pounds VOC/day;
  - c. 0.04 pounds PE/hour.

The permittee shall include in the report the actual emissions for each such day/hour.

4. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the following annual emission limitations:
  - a. 3.4 tons OC/yr;
  - b. 0.1 ton PE/yr.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year. If no deviations occur during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that year.

5. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all exceedances of the maximum allowable VOC emission levels specified in Section A.II.3.
6. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 3.1 tons VOC per rolling, 365-day period.

## **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of

this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**  
1.10 lbs OC/hr and 3.4 tons OC/yr

**Applicable Compliance Method:**

The record keeping requirements specified in Section A.III.3. of this permit shall be used to determine compliance with the hourly and annual OC emission limitations.

- b. **Emission Limitation:**  
0.98 lb VOC/hr and 3.1 tons VOC per rolling, 365-day period

**Applicable Compliance Method:**

The record keeping requirements specified in Section A.III.3. of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations.

- c. **Emission Limitation:**  
0.04 lb PE/hr and 0.1 ton PE/yr

**Applicable Compliance Method:**

The record keeping requirements specified in Section A.III.4. of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

- d. **Emission Limitation:**  
Visible PE shall not exceed 0% opacity, as a six-minute average

**Applicable Compliance Method:**

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

## VI. Miscellaneous Requirements

None

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**B. State Only Enforceable Section**

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

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| K005 - Paint engineering lab with dry filtration. | None                                 | See B.III.   |

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model were compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

| AIR TOXIC    | TLV (mg/m3) | MAGLC (ug/m3) | Maximum 1-Hour Average Concentration (ug/m3) |
|--------------|-------------|---------------|--|
| Ethylbenzene | 434.73      | 10337.91      | 2293.58                                      |
| Styrene      | 85.20       | 2028.63       | 1.66   |

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|                                   |         |          |         |
|-----------------------------------|---------|----------|---------|
| Methyl Propyl Ketone              | 704.87  | 16782.55 | 2293.58 |
| Methyl Isobutyl Ketone            | 204.83  | 4876.81  | 2293.58 |
| Mesitylene                        | 122.89  | 2926.04  | 2293.58 |
| Diisobutyl Ketone                 | 145.43  | 3462.61  | 2293.58 |
| Toluene                           | 188.40  | 4485.83  | 2293.58 |
| Ketohexamethylene (Cyclohexanone) | 96.30   | 2292.82  | 126.90  |
| Isobutyl Acetate                  | 712.64  | 16967.57 | 2293.58 |
| Methyl Amyl Ketone                | 233.50  | 5559.45  | 2293.58 |
| n-Butyl Acetate                   | 712.64  | 16967.57 | 2293.58 |
| Isoamyl Acetate                   | 266.26  | 6339.47  | 2293.58 |
| Xylene                            | 434.19  | 10337.91 | 2293.58 |
| Ethyl Acetate                     | 1441.31 | 34316.88 | 2293.58 |
| n-Heptane                         | 1639.26 | 39030.09 | 2293.58 |
| Trimethylbenzene                  | 122.89  | 2926.04  | 2293.58 |
| n-Amyl Acetate                    | 266.26  | 6339.47  | 2293.58 |
| Ethyl Alcohol                     | 1884.25 | 44863.18 | 2293.58 |
| Methyl Alcohol                    | 262.09  | 6240.14  | 2293.58 |
| Isopropyl Alcohol                 | 983.07  | 23406.37 | 2293.58 |
| n-Butyl Alcohol                   | 151.57  | 3608.92  | 2293.58 |
| Isobutyl Alcohol                  | 151.57  | 3608.92  | 2293.58 |
| Methyl Ethyl Ketone               | 589.78  | 14042.26 | 2293.58 |
| Stoddard Solvent                  | 572.60  | 13633.27 | 2293.58 |
| Hexamethylene Diisocyanate        | 0.03    | 0.82     | 0.81    |
| 1,2,4-Trimethylbenzene            | 122.89  | 2926.04  | 2293.58 |
| Isopropylbenzene                  | 245.79  | 5852.08  | 2293.58 |

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 3. 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.

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None