State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
SANDUSKY COUNTY
Application No: 03-13836
Fac ID: 0372030199
DATE: 1/19/2006

Eaton Inoac Company
Shawn Reinhart
1410 Motor Dr
Fremont, OH 43420

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 300** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA NWDO Toledo Met Area Council of Govs MI

SANDUSKY COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-13836** FOR AN AIR CONTAMINANT SOURCE FOR
Eaton Inoac Company

On 1/19/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Eaton Inoac Company**, located at **1410 Motor Dr, Fremont**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13836:

Modification to PTI 03-13836, issued 7/24/03, to update recordkeeping and emission limits.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-13836

Application Number:	03-13836
Facility ID:	0372030199
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Eaton Inoac Company
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 to PTI 03-13836, issued 7/24/03, to update recordkeeping and emission limits.

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification

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, 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 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, 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

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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., postmarked), 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

Pollutant	Tons Per Year
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

The facility is subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Surface Coating of Plastic Parts and Products. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. All the requirements of 40 CFR Part 63, Subpart PPPP are specified in Attachment A.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P021 - Paint blending operations. . Modification to PTI #03-13836, issued 7/24/03. Modification involves eliminating organic compound emissions and adjusting the monitoring and recordkeeping requirements.	OAC rule 3745-31-05 (A)(3)	82.80 lbs volatile organic compounds (VOC)/day (see A.I.2.a.) See A.I.2.b.
	OAC rule 3745-31-05 (C)	5.0 tons VOC per rolling, 365-day period (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).

2.b The requirements of this rule also include compliance with OAC rule 3745-31-05 (C).

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 develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:

   a. pounds VOC/day; and

   b. tons VOC per rolling, 365-day period.

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

   The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the daily emission limitation of 82.80 pounds VOC/day. The permittee shall include in the report the actual emissions for each such day.

2. The permittee shall submit quarterly 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 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. **<u>Emission Limitation</u>:**
   82.80 lbs VOC/day and 5.0 tons VOC per rolling, 365-day period

   <u>Applicable Compliance Method</u>:
   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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P021 - Paint blending operations. . Modification to PTI #03-13836, issued 7/24/03. Modification involves eliminating organic compound emissions and adjusting the monitoring and recordkeeping requirements.	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/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
Mesithylene	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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K004 - Paint Line #4. Modification to PTI #03-13836, issued 7/24/03. Modification involves eliminating organic compound emission limitation, applying OAC rule 3745-21-07(G)(1) to curing operations, and revising opacity restriction	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-11 (B)
		OAC rule 3745-18-06 (A)
		OAC rule 3745-23-06 (B)
		OAC rule 3745-21-08 (B)
		40 CFR, Part 63, Subpart PPPP
	OAC rule 3745-31-05) (C)	
	OAC rule 3745-21-07 (G)(2)	
	OAC rule 3745-21-07 (G)(1)	
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-17-10 (B)	

Applicable Emissions Limitations/Control Measures	TERMS AND CONDITIONS
117.00 lbs volatile organic compounds (VOC)/hr (see A.I.2.b & A.I.2.f.)	
6.10 lbs particulate emissions (PE)/hr 14.5 tons PE/yr	
Visible PE shall not exceed 5% 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.	
Organic compound (OC) emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation (see A.I.2.b & 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.	
See A.I.2.j	
See Section A of Part II - FACILITY SPECIFIC	

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

2.b The volatile organic compound limitations represent emissions of VOC as defined in OAC rule 3745-21-01. The organic compound (OC) limitations for curing operations established by OAC rule 3745-21-07(G)(1) represent emissions of OC as defined in OAC rule 3745-21-01. The OC emissions from curing operations are considered VOCs for this emissions unit (see A.I.2.f).

2.c The requirements of this rule also include compliance with the requirements of OAC rules: 3745-31-05 (D), 3745-21-07(G)(1) and 3745-17-10 (B).

2.d All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM_{10}).

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 VOC limitation of 117.0 pounds/hour is established for all VOCs emitted from paint line #4 (see A.I.2.a) and includes emissions from curing operations. Each curing operation is also applicable to the requirement under OAC rule 3745-21-07(G)(1) that OC emissions do not exceed 3 pounds/hour and 15 pounds/day (see A.I.2.b).

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 to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revisions to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.j The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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.

3. The permittee shall burn only natural gas in this emissions unit.

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 .

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 develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line (cleanup operations associated with the coating operations are permitted under emissions unit P801):

   a. average pounds VOC/hour from coating operations for the entire line (total daily VOC emissions divided by total hours of coating operation);

   b. tons VOC/rolling, 365-day period from coating operations for the entire line;

   c. average pounds PE/hour from coating operations for the entire line (total daily PE emissions divided by total hours of coating operation);

   d. annual, year to date particulate emission rate, in tons, from coating operations for the entire line (summation of the total daily PE in "c" for each calendar day to date from January to December).

   e. pounds OC/day* from each curing operation (oven) associated with the coating line; and

   f. average pounds OC/hour* from each curing operation (oven) associated with the coating line (total daily curing emissions for each oven divided by the total hours of curing operation).

   *For purposes of calculating the OC emission rates for curing operations as required in "e" and "f" above, the permittee shall utilize a value of 99.25 percent as the maximum percentage of OCs employed in each coating operation that is

emitted uncontrolled from each coating operation. The remaining 0.75 percent of the OCs employed in each coating operation shall be considered to be the uncontrolled emissions for each coating operation's associated curing (oven). This "split" of OC emissions between the coating operations and their curing operations (ovens) was based upon emission testing conducted by the permittee. The "split" of VOC emissions between the coating operations and their associated curing operations (ovens) shall be revised in accordance with the results of any future testing (weight %).

The OC emissions for curing operations regulated under OAC rule 3745-21-07(G)(1) represent emissions of OC as defined in OAC rule 3745-21-01. The OC emissions from curing operations are considered VOCs for this emissions unit.

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

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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 quarterly 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. 117.00 pounds VOC/hour;

   b. 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 that identify the total particulate emissions from coating operations for the entire line, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

5. The permittee shall submit quarterly 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.

6. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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:**
   Organic compound (OC) emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation

   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 daily 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.3 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 5% 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. **<u>Emission Limitation:</u>**
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)

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

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings employed in this emissions unit.

VI. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004 -Paint Line #4. Modification to PTI #03-13836, issued 7/24/03. Modification involves eliminating organic compound emission limitation, applying OAC rule 3745-21-07(G)(1) to curing operations, and revising opacity restriction	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	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
Mesithylene	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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - Paint engineering lab with dry filtration. Modification to PTI #03-13836, issued 7/24/03. The modification involves eliminating organic compound emissions, adjusting monitoring and recordkeeping requirements, and increasing the opacity restriction.	OAC rule 3745-31-05 (A)(3)	23.52 lbs volatile organic compounds (VOC)/day 0.04 lb particulate emissions (PE)/hr 0.1 ton PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average See A.I.2.a., A.I.2.b., and A.I.2.c.
	OAC rule 3745-31-05 (C)	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.f
	OAC rule 3745-17-11 (B)	See A.I.2.e.

2. Additional Terms and Conditions

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_{10}).

2.c The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(6).

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).

2.f The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

2. The permittee shall operate the dry filtration system whenever the unit is in operation.

3. 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)

Month(s)	VOC Emissions
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 develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line:

   a. pounds VOC/day;

   b. tons VOC/rolling, 365-day period;

   c. average pounds PE/hour (total daily PE emissions divided by total hours of operation);

   d. annual, year to date particulate emission rate, in tons (summation of the total daily PE in "c" for each calendar day to date from January to December).

   The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

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 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 quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the following emission limitations:

   a. 23.52 pounds VOC/day;

   b. 0.04 pounds PE/hour.

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

4. The permittee shall submit annual reports that identify the total particulate emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar 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 identifiy all exceedances of the maximum allowable VOC emission levels specified in Section A.II.3.

6. The permittee shall submit quarterly 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:

b. **Emission Limitation:**
23.52 lbs VOC/day 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 daily 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.3 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 5% 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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

Methyl Propyl Ketone	704.87	16782.55	2293.58
Methyl Isobutyl Ketone	204.83	4876.81	2293.58
Mesithylene	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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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