

Synthetic Minor Determination and/or Netting Determination

Permit To Install 03-13939

A. Source Description

This is a new facility that will coat plastic/rubber parts. The company will be installing 4 paint lines, which consist of 5 spray booths and 5 infrared curing ovens.

B. Facility Emissions and Attainment Status

The company has potential emissions greater than 250 TPY, but are requesting a Synthetic Minor to avoid Title V and PSD requirements. Seneca county is in attainment for all criteria pollutants.

C. Source Emissions

Alpha Coatings has requested Federally enforceable emission limits restricting the potential to emit of the paint booths and curing ovens, combined, to 75.0 tons OC per rolling, 365-day period. For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions. In addition, Synthetic Minor limits have been established for the company's HAPs of less than 10 tons of an individual HAP per rolling, 12-month period and less than 25 tons of any combined HAPs per rolling, 12-month period.

D. Conclusion

Emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 have been assigned the following combined emissions limitations in order to avoid Title V and PSD:

- i. 75.0 tons OC per rolling, 365-day period;
- ii. less than 10 tons of any individual HAP per rolling, 12 month period; and
- iii. less than 25 tons of combined HAPs per rolling, 12-month period.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
SENECA COUNTY**

CERTIFIED MAIL

Application No: 03-13939

DATE: 4/24/2003

Alpha Coatings, Inc.
Cyndi Miller
431 East North Street
Fostoria, OH 44830

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the 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 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 may be issued in proposed or 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 a fee of **\$2400** 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.

Very truly yours,

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

CC: USEPA

NWDO

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SENECA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13939 FOR AN AIR CONTAMINANT SOURCE FOR
ALPHA COATINGS, INC.

On 4/24/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alpha Coatings, Inc.**, located at **622 South Corporate Drive, Fostoria, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13939:

Installation of 4 plastic/rubber parts coating lines.

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]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-13939

Application Number: 03-13939
APS Premise Number: 0374010217
Permit Fee: **To be entered upon final issuance**
Name of Facility: Alpha Coatings, Inc.
Person to Contact: Cyndi Miller
Address: 431 East North Street
Fostoria, OH 44830

Location of proposed air contaminant source(s) [emissions unit(s)]:
**622 South Corporate Drive
Fostoria, Ohio**

Description of proposed emissions unit(s):
Installation of 4 plastic/rubber parts coating lines.

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. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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

Alpha Coatings, Inc.

Facility ID: 0374010217

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Issued: To be entered upon final issuance

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.

10. 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.

11. Applicability

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.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- 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

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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).

Emissions Unit ID: P001

- 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.

14. 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.

15. 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.

B. 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	75.0
Individual HAP	less than 10
Combined HAPs	less than 25

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P001 - Paint cure oven (Line 1).	OAC rule 3745-31-05 (A)(3)	2.74 tons organic compounds (OC)/yr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling, 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-07 (G)(1).

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- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Alpha

PTI A

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Emissions Unit ID: P001

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R001), the permittee shall utilize a value obtained from the results of emission testing required on a similar source (P002) as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining percentage value of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

Prior to obtaining values from the results of the required emission testing, the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee

Emissions Unit ID: P001

shall collect and record the following information for each day for the oven:

- a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1. of this permit), in pounds per day.
 - b. The total number of hours this emissions unit was in operation.
 - c. The average hourly organic compound emission rate (a./b.), in pounds per hour.
3. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

4. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.

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- c. The number of gallons of each coating employed.
- d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
- e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
- f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 5. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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

Emissions Unit ID: **P001**

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, 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.

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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms

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and Conditions of this permit, which include the following information:

- a. An identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
 3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined, of 75.0 tons per rolling, 365-day period.
 4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitations:**
3.0 lbs OC/hr and 15.0 lbs OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.

b. **Emissions Limitation:**

2.74 tons OC/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the daily OC limitation by 365 days/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the daily limitation, compliance with the annual limit will be assumed.

c. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

d. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P002 - Paint cure oven (Line 2).	OAC rule 3745-31-05 (A)(3)	2.74 tons organic compounds (OC)/yr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling, 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule

Alpha

PTI A

Issued: To be entered upon final issuance

3745-31-05 (D) and OAC rule 3745-21-07 (G)(1).

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.

- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R002), the permittee shall utilize a value obtained from the results of emission testing required in Section E.2. and E.3. as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining percentage value of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

Prior to obtaining values from the results of the required emission testing, the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee shall collect and record the following information for each day for the oven:
 - a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of

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the emissions associated with this emissions unit (as defined in Section C.1. of this permit), in pounds per day.

- b. The total number of hours this emissions unit was in operation.
 - c. The average hourly organic compound emission rate (a./b.), in pounds per hour.
3. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

4. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).

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- e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
- f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 5. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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"

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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, 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.

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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:

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- a. An identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
 3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined, of 75.0 tons per rolling, 365-day period.
 4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitations:**
3.0 lbs OC/hr and 15.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.
 - b. **Emissions Limitation:**

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2.74 tons OC/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the daily OC limitation by 365 days/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the daily limitation, compliance with the annual limit will be assumed.

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- c. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

- d. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted not later than 180 days after start-up of this emissions unit, or as approved by Ohio EPA.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for OC and to determine the "split" in emissions between this oven and its associated paint booth. The split shall be determined to be the percentage of the total OC emissions from the paint line that are emitted from each the oven and the paint booth.
- c. Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates and to determine the "split" of emissions between this emissions unit and its associated spray booth.
- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P003 - Paint cure oven (Line 3a).	OAC rule 3745-31-05 (A)(3)	2.74 tons organic compounds (OC)/yr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling, 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-07 (G)(1).

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- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R003), the permittee shall utilize a value obtained from the results of emission testing required in Section E.2. and E.3. as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining percentage value of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

Prior to obtaining values from the results of the required emission testing, the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee

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shall collect and record the following information for each day for the oven:

- a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1. of this permit), in pounds per day.
 - b. The total number of hours this emissions unit was in operation.
 - c. The average hourly organic compound emission rate (a./b.), in pounds per hour.
3. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

4. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.

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- c. The number of gallons of each coating employed.
- d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
- e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
- f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 5. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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

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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"

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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, 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.

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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:

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- a. An identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
 3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined, of 75.0 tons per rolling, 365-day period.
 4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitations:**
3.0 lbs OC/hr and 15.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.

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- b. **Emissions Limitation:**
2.74 tons OC/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the daily OC limitation by 365 days/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the daily limitation, compliance with the annual limit will be assumed.

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- c. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

- d. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted not later than 180 days after start-up of this emissions unit, or as approved by Ohio EPA.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for OC and to determine the "split" in emissions between this oven and its associated paint booth. The split shall be determined to be the percentage of the total OC emissions from the paint line that are emitted from each the oven and the paint booth.
- c. Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates and to determine the "split" of emissions between this emissions unit and its associated spray booth.
- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P004 - Paint cure oven (Line 3b).	OAC rule 3745-31-05 (A)(3)	2.74 tons organic compounds (OC)/yr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling, 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule

3745-31-05 (D) and OAC rule 3745-21-07 (G)(1).

- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R004), the permittee shall utilize a value obtained from the results of emission testing required on a similar source (P003) as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining percentage value of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

Prior to obtaining values from the results of the required emission testing, the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee shall collect and record the following information for each day for the oven:

- a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1. of this permit), in pounds per day.
 - b. The total number of hours this emissions unit was in operation.
 - c. The average hourly organic compound emission rate (a./b.), in pounds per hour.
3. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

4. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.

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- d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
- e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
- f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 5. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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

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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, 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.

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.

D. Reporting Requirements

Emissions Unit ID: P004

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined, of 75.0 tons per rolling, 365-day period.
4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitations:**
3.0 lbs OC/hr and 15.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.

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- b. **Emissions Limitation:**
2.74 tons OC/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the daily OC limitation by 365 days/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the daily limitation, compliance with the annual limit will be assumed.

- c. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

- d. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4.

F. Miscellaneous Requirements

None

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Emissions Unit ID: P005

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P005 - Paint cure oven (Line 4).	OAC rule 3745-31-05 (A)(3)	2.74 tons organic compounds (OC)/yr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling, 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)(1)	OC emissions shall not exceed 3 pounds per hour and 15 pounds per day

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule include compliance with the requirements of OAC rule

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3745-31-05 (D) and OAC rule 3745-21-07 (G)(1).

- 2.b** For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c** The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d** The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R005), the permittee shall utilize a value obtained from the results of emission testing required in Section E.2. and E.3. as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining percentage value of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

Prior to obtaining values from the results of the required emission testing, the permittee shall utilize a value of 90% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit.

2. In order to demonstrate compliance with the hourly and daily OC emission limits, the permittee shall collect and record the following information for each day for the oven:

- a. The total potential daily organic compound emission rate for all coatings employed in the paint booth associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1. of this permit), in pounds per day.
 - b. The total number of hours this emissions unit was in operation.
 - c. The average hourly organic compound emission rate (a./b.), in pounds per hour.
3. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.
- Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.
4. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
- a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.

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- d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
- e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
- f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 5. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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

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satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy"

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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, 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.

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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:

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- a. An identification of each day during which the average hourly organic compound emissions exceeded 3.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 15.0 pounds per day, and the actual organic compound emissions for each such day.
2. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
 3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined, of 75.0 tons per rolling, 365-day period.
 4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitations:**
3.0 lbs OC/hr and 15.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.

- b. **Emissions Limitation:**
2.74 tons OC/yr

Applicable Compliance Method:

This emission limitation was established by multiplying the daily OC limitation by 365 days/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the daily limitation, compliance with the annual limit will be assumed.

- c. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

- d. **Emission Limitation:** Combined limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted not later than 180 days after start-up of this emissions unit, or as approved by Ohio EPA.
 - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for OC and to determine the "split" in emissions between this oven and its associated paint booth. The split shall be determined to be the percentage of the total OC emissions from the paint line that are emitted from each the oven and the paint booth.

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- c. Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates and to determine the "split" of emissions between this emissions unit and its associated spray booth.
 - d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA district office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R001 - Paint spray booth with dry filtration (Line 1).	OAC rule 3745-31-05 (A)(3)	128.0 lbs organic compounds (OC)/hr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limits for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)	See B.1.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05 (D).

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- 2.b** For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.

- 2.c** The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d** The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

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<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.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 this emissions unit.
 - 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. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification for each coating employed.

- b. The number of gallons of each coating employed.
- c. The OC contents of each coating, in pounds per gallon.
- d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
- e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
- f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
 - e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
 - f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
 - g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
 - h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

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Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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, 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.

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 Toxics 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.

D. 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. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation from emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 of 75.0 tons per rolling, 365-day period.

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Emissions Unit ID: **R001**

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4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP

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emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
128.0 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gallon and a maximum hourly usage rate of 20 gallons/hr. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- c. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

1. The following Term and Condition is a note of clarification that cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-01 (C)(3).

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R002 - Paint spray booth with dry filtration (Line 2).	OAC rule 3745-31-05 (A)(3)	128.0 lbs organic compounds (OC)/hr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limits for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d. See B.1.
	OAC rule 3745-21-07 (G)	

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule

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3745-31-05 (D).

- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the

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permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.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 this emissions unit.
 - 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).

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2. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC contents of each coating, in pounds per gallon.
 - d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
 - e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
 - f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
 - e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
 - f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.

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- g. For the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.
- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 4. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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, 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.

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 Toxics 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.

D. 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. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and

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- b. all exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.d.
3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation from emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 of 75.0 tons per rolling, 365-day period.
4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
128.0 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gallon and a maximum hourly usage rate of 20 gallons/hr. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

Emissions Unit ID: **R002**

- c. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

1. The following Term and Condition is a note of clarification that cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-01 (C)(3).

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Emissions Unit ID: R003

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R003 - Paint spray booth with dry filtration (Line 3a).	OAC rule 3745-31-05 (A)(3)	128.0 lbs organic compounds (OC)/hr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limits for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)	See B.1.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule include compliance with the requirements of OAC rule

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3745-31-05 (D).

- 2.b** For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c** The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d** The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the

permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.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 this emissions unit.
 - 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. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003,

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P004, P005, R001, R002, R003, R004, and R005, combined:

- a. The company identification for each coating employed.
- b. The number of gallons of each coating employed.
- c. The OC contents of each coating, in pounds per gallon.
- d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
- e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
- f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
 - e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
 - f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
 - g. For the first 12 months of operation following the issuance of this permit, the cumulative

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monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.

- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 4. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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, 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;

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- 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.

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 Toxics 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.

D. 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. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in

Section A.2.d.

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation from emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 of 75.0 tons per rolling, 365-day period.
4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
128.0 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gallon and a maximum hourly usage rate of 20 gallons/hr. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- c. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005,

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R001, R002, R003, R004, and R005:

less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

1. The following Term and Condition is a note of clarification that cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-01 (C)(3).

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R004 - Paint spray booth with dry filtration (Line 3b).	OAC rule 3745-31-05 (A)(3)	128.0 lbs organic compounds (OC)/hr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limits for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d. See B.1.
	OAC rule 3745-21-07 (G)	

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule

3745-31-05 (D).

- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: R004

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.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 this emissions unit.
 - 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. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003,

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P004, P005, R001, R002, R003, R004, and R005, combined:

- a. The company identification for each coating employed.
- b. The number of gallons of each coating employed.
- c. The OC contents of each coating, in pounds per gallon.
- d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
- e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
- f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
 - e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
 - f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
 - g. For the first 12 months of operation following the issuance of this permit, the cumulative

Emissions Unit ID: R004

monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.

- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

- 4. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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, 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

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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.

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 Toxics 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.

D. 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. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in

Section A.2.d.

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation from emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 of 75.0 tons per rolling, 365-day period.
4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

a. **Emission Limitation:**

128.0 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gallon and a maximum hourly usage rate of 20 gallons/hr. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- c. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

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less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

1. The following Term and Condition is a note of clarification that cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-01 (C)(3).

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R005 - Paint spray booth with dry filtration (Line 4).	OAC rule 3745-31-05 (A)(3)	128.0 lbs organic compounds (OC)/hr See A.2.a.
	OAC rule 3745-31-05 (D)	Combined limits for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005: 75.0 tons OC per rolling 365-day period (see A.2.b.) less than 10 tons per rolling, 12-month period for any individual HAP* and less than 25 tons per rolling, 12-month period for any combination of HAPs See A.2.c. and A.2.d.
	OAC rule 3745-21-07 (G)	See B.1.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with the requirements of OAC rule

3745-31-05 (D).

- 2.b For the purpose of federal enforceability, OC emission limitations will effectively restrict VOC emissions.
- 2.c The permittee has requested a federally enforceable limitation of 75.0 tons OC per rolling, 365-day period for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the OC emission rates specified in the following table:

Maximum Allowable Cumulative OC Emission Rates (tons)

<u>Month(s)</u>	<u>OC Emissions</u>
1-1	6.25
1-2	12.50
1-3	18.75
1-4	25.00
1-5	31.25
1-6	37.50
1-7	43.75
1-8	50.00
1-9	56.25
1-10	62.50
1-11	68.75
1-12	75.0

After the first 12 calendar months of operation, compliance with the annual OC emission limitation of 75.0 tons shall be based upon a rolling, 365-day summation of the daily OC emission rates.

- 2.d The permittee has requested federally enforceable limitations of less than 10 tons of any individual HAP and less than 25 tons of combined HAPs per rolling, 12-month periods for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, as a group, for the purposes of avoiding Title V and PSD applicability:

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: R005

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23
1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.9	24.9

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the condition specified in Section B.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 this emissions unit.
 - 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. In order to demonstrate compliance with the annual OC emission limitation, the permittee shall collect and record the following information each day for emissions units P001, P002, P003,

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P004, P005, R001, R002, R003, R004, and R005, combined:

- a. The company identification for each coating employed.
- b. The number of gallons of each coating employed.
- c. The OC contents of each coating, in pounds per gallon.
- d. The OC emission rates (prior to applying a booth/oven "split") from the paint booths, in pounds per day, (summation of (b. x c.) for all coatings employed).
- e. For the first 12 months of operation following the issuance of this permit, the cumulative monthly OC emission rate, in tons per month.
- f. After the first 12 months of operation, the annual emissions of OC, in tons, based on a rolling, 365-day summation of the daily OC emission rates.

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

3. In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined:
 - a. The company identification of each coating employed.
 - b. The pounds per gallon of each HAP in each coating, as applied.
 - c. The number of gallons of each coating employed.
 - d. The emission rate, in pounds, for each HAP from each coating employed (b. x c.).
 - e. The total emission rate for each HAP from all coatings employed (summation of (d.) for each HAP), in pounds per month.
 - f. The total HAP emission rate for the combination of all HAPs from all coatings employed (summation of e.), in pounds per month.
 - g. For the first 12 months of operation following the issuance of this permit, the cumulative

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monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month.

- h. After the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 was evaluated based on the actual materials 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, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,337.0

MAGLC (ug/m³): 4,876.9

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, 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

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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.

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 Toxics 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.

D. 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. 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 any of the following:
 - a. all exceedances of the maximum allowable cumulative OC emission levels specified in Section A.2.c.; and
 - b. all exceedances of the maximum allowable cumulative HAP emission levels specified in

Section A.2.d.

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the annual OC emission limitation from emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005 of 75.0 tons per rolling, 365-day period.
4. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the rolling, 12-month HAP emission limitations for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005, combined.

E. Testing Requirements

1. Compliance with the allowable emission limitations specified in Section A.1. of the Terms and Conditions of this permit shall be determined in accordance with the following methods:

a. **Emission Limitation:**

128.0 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.4 lbs/gallon and a maximum hourly usage rate of 20 gallons/hr. This emission limitation is based on a worst-case assumption that all OC emissions from the paint booth and its associated oven are emitted from the booth.

- b. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

75.0 tons OC per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- c. **Emission Limitation:** Group limit for emissions units P001, P002, P003, P004, P005, R001, R002, R003, R004, and R005:

Alpha

PTI A

Emissions Unit ID: **R005**

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less than 10 tons individual HAP per rolling, 12-month period
less than 25 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

1. The following Term and Condition is a note of clarification that cleanup operations associated with this emissions unit do not employ liquid organic materials, as defined in OAC rule 3745-21-01 (C)(3).