State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
WILLIAMS COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17383
Fac ID: 0386010099
DATE: 1/15/2008

ITW Tomco
Paul Witte
730 East South Street
Bryan, OH 43506

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO**

OhioEPA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 1/15/2008**
Terms and Conditions	**Effective Date: 1/15/2008**

FINAL PERMIT TO INSTALL 03-17383

Application Number:	03-17383
Facility ID:	0386010099
Permit Fee:	**$600**
Name of Facility:	ITW Tomco
Person to Contact:	Paul Witte
Address:	730 East South Street Bryan, OH 43506

Location of proposed air contaminant source(s) [emissions unit(s)]:
730 East South Street
Bryan, **Ohio**

Description of proposed emissions unit(s):
3 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

Chris Korleski
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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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 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

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

Pollutant	Tons Per Year
OC	33.3

Emissions Unit ID: **K001**

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.

Operations, Property, and/or Equipment - (K001) - Adhesive Dip Tank - Metal Automotive Parts

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	63.7 lbs of organic compounds (OC) /day; 11.6 tons of OC /year See A.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPS) shall not exceed 9.80 tons per rolling, 12-month period for an individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS, for emissions units K001, K002, and K003, combined (see A.2.b).
ORC 3704.03(F) OAC rule 3745-114-01	See C.3

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-09(U)(2)(e)(iii).

2.b This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPS) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions unit K001, K002, and K003, shall not exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

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

following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPS
1 - 1	0.82	2.00
1 - 2	1.63	4.00
1 - 3	2.45	6.00
1 - 4	3.27	8.00
1 - 5	4.08	10.0
1 - 6	4.90	12.0
1 - 7	5.72	14.0
1 - 8	6.53	16.0
1 - 9	7.35	18.0
1 - 10	8.17	20.0
1 - 11	8.98	22.0
1 - 12	9.80	24.0

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

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name and identification number of each coating material employed;

   b. the number of gallons of each coating material employed;

   c. the total number of gallons of all the coating materials employed;

   d. the OC content of each coating material employed, in lbs/gallon;

e. the total emissions of OC for each coating material employed (b x d), in lbs; and

f. the total emissions of OC for all the coating materials employed (summation of e for all coatings), in lbs.

2. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:

a. the name and identification number of each coating and cleanup material employed;

b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in lbs;

f. the total HAP emission rate for all HAPS combined from all the coatings and cleanup materials employed (summation of 'e' for all HAPS for all coatings and cleanup materials), in lbs;

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPS combined, in tons; and

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPS combined, in tons.

3. The permit to install for emissions unit K001 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 application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for

each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV OVER 10 ~ TIMES ~ { 8 OVER X } ~ TIMES ~ { 5 OVER Y } ~ = ~
4 ~ { TLV OVER XY } ~ = ~ MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: methanol

TLV (mg/m^3): 260
Maximum Hourly Emission Rate (lbs/hr): 10.5 lbs/gal
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 598
MAGLC (ug/m^3): 10,900

The permittee has demonstrated that emissions of methanol from emissions unit K001 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

4. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

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

   If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground

level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions

5. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

   a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

   b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

   c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

   d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

6. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPS emission limitations specified in section A.2.b (for emissions units K001, K002, and K003, combined).

b. after the first 12 months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPS emission limitations of 9.80 tons and 24.0 tons, respectively (for emissions units K001, K002, and K003, combined).

c. all exceedances of the daily OC emission limitation of 63.7 pounds (for this emissions unit).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Northwest District Office of any daily record showing that the coating line employed more than the maximum daily coating usage restriction of 10 gallons. A copy of such record shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

a. <u>Emission Limitations</u>
63.7 lbs OC /day
11.6 tons OC /year

<u>Applicable Compliance Method</u>
Compliance with the daily limitation shall be based on the record keeping requirements specified in section C.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown

with the daily limitation, compliance is shown with the annual limitation.

b. Emission Limitation
Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method
Compliance shall be based on the record keeping requirements specified in section C.1.c of this permit.

c. Emission Limitation
Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

Applicable Compliance Method
Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition C.2 of this permit.

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.

Issued: 1/15/2008

F. Miscellaneous Requirements

None

Issued: 1/15/2008

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.

Operations, Property, and/or Equipment - (K002) - Adhesive Dip Tank - Plastic Automotive Parts

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	65.1 lbs of organic compounds (OC) /day; 11.9 tons of OC /year See A.2.a.
OAC rule 3745-21-07(G)	See B.1.
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPS) shall not exceed 9.80 tons per rolling, 12-month period for an individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS, for emissions units K001, K002, and K003, combined (see A.2.b).
ORC 3704.03(F) OAC rule 3745-114-01	See C.3

2. Additional Terms and Conditions

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

2.b This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPS) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions unit K001, K002, and K003, shall not exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPS
1 - 1	0.82	2.00
1 - 2	1.63	4.00
1 - 3	2.45	6.00
1 - 4	3.27	8.00
1 - 5	4.08	10.0
1 - 6	4.90	12.0
1 - 7	5.72	14.0
1 - 8	6.53	16.0
1 - 9	7.35	18.0
1 - 10	8.17	20.0
1 - 11	8.98	22.0
1 - 12	9.80	24.0

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

B. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

   a. the name and identification number of each coating material employed;

   b. the number of gallons of each coating material employed;

c. the total number of gallons of all the coating materials employed;

d. the OC content of each coating material employed, in lbs/gallon;

e. the total emissions of OC for each coating material employed (b x d), in lbs; and

f. the total emissions of OC for all the coating materials employed (summation of e for all coatings), in lbs.

2. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:

a. the name and identification number of each coating and cleanup material employed;

b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in lbs;

f. the total HAP emission rate for all HAPS combined from all the coatings and cleanup materials employed (summation of 'e' for all HAPS for all coatings and cleanup materials), in lbs;

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPS combined, in tons; and

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPS combined, in tons.

3. The permit to install for emissions unit K002 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 application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV OVER 10 ~ TIMES ~ { 8 OVER X } ~ TIMES ~ { 5 OVER Y } ~ = ~
4 ~ { TLV OVER XY } ~ = ~ MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic

contaminant(s):

Toxic Contaminant: methanol
TLV (mg/m^3): 260
Maximum Hourly Emission Rate (lbs/hr): 10.5 lbs/gal
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 598
MAGLC (ug/m^3): 10,900

The permittee has demonstrated that emissions of methanol from emissions unit K002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

4. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

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

   If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the

emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions

5. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

   a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

   b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

   c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

   d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

6. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. for the first 12 calendar months of operation under the provisions of this permit,

all exceedances of the maximum allowable cumulative individual HAP and combined HAPS emission limitations specified in section A.2.b (for emissions units K001, K002, and K003, combined).

b. after the first 12 months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPS emission limitations of 9.80 tons and 24.0 tons, respectively (for emissions units K001, K002, and K003, combined).

c. all exceedances of the daily OC emission limitation of 65.1 pounds (for this emissions unit).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Northwest District Office of any daily record showing that the coating line employed more than the maximum daily coating usage restriction of 10 gallons. A copy of such record shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

a. <u>Emission Limitations</u>
65.1 lbs OC /day
11.9 tons OC /year

<u>Applicable Compliance Method</u>
Compliance with the daily limitation shall be based on the record keeping requirements specified in section C.1 of this permit.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.

b. Emission Limitation
Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

Applicable Compliance Method
Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition C.2 of this permit.

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.

F. Miscellaneous Requirements

None

Issued: 1/15/2008

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.

Operations, Property, and/or Equipment - (K003) - Brush Coating Operation - Metal Automotive Parts

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPS) shall not exceed 9.80 tons per rolling, 12-month period for an individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS, for emissions units K001, K002, and K003, combined (see A.2.b).
ORC 3704.03(F) OAC rule 3745-114-01	See C.2

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC/OC emissions from this air contaminant source since the calculated annual emission rate for VOC/OC is less than ten tons per year taking into account the federally enforceable rule limit from OAC 3745-21-09(U)(2)(e)(iii) of coating usage not exceeding 10 gallons per day, and the maximum VOC/OC content of the coatings of 5.34 pounds per gallon.

2.b This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPS) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions unit K001, K002, and K003, shall not

exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Combined HAPS
1 - 1	0.82	2.00
1 - 2	1.63	4.00
1 - 3	2.45	6.00
1 - 4	3.27	8.00
1 - 5	4.08	10.0
1 - 6	4.90	12.0
1 - 7	5.72	14.0
1 - 8	6.53	16.0
1 - 9	7.35	18.0
1 - 10	8.17	20.0
1 - 11	8.98	22.0
1 - 12	9.80	24.0

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

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following HAP information each month for emissions units K001, K002, and K003, combined:

   a. the name and identification number of each coating and cleanup material employed;

   b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the emission rate for each individual HAP from each coating and cleanup material employed (b x c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of A.III.3.d for all coatings and cleanup materials), in lbs;

f. the total HAP emission rate for all HAPS combined from all the coatings and cleanup materials employed (summation of 'e' for all HAPS for all coatings and cleanup materials), in lbs;

g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPS combined, in tons; and

h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPS combined, in tons.

2. The permit to install for emissions unit K003 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 application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

   a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of

preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV OVER 10 ~ TIMES ~ { 8 OVER X } ~ TIMES ~ { 5 OVER Y } ~ = ~
4 ~ { TLV OVER XY } ~ = ~ MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: methanol
TLV (mg/m^3): 260
Maximum Hourly Emission Rate (lbs/hr): 10.5 lbs/gal
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 598
MAGLC (ug/m^3): 10,900

The permittee has demonstrated that emissions of methanol from emissions unit K003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

3. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model

the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions

4. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in

accordance with ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

5. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. for the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPS emission limitations specified in section A.2.b (for emissions units K001, K002, and K003, combined).

   b. after the first 12 months of operation under the provisions of this permit, all exceedances of the rolling, 12-month individual HAP and combined HAPS emission limitations of 9.80 tons and 24.0 tons, respectively (for emissions units K001, K002, and K003, combined).

   c. all exceedances of the daily OC emission limitation of 64.0 pounds (for this emissions unit).

   These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Northwest District Office of any daily record showing that the coating line employed more than the maximum daily coating usage restriction of 10

gallons. A copy of such record shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

Emissions Unit ID: **K003**

E. Testing Requirements

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

   a. Emission Limitation
   Coating usage shall not exceed 10 gallons per day

   Applicable Compliance Method
   Compliance shall be based on the record keeping requirements specified in section C.1.c of this permit.

   b. Emission Limitation
   Annual HAP emissions from emissions units K001, K002, and K003, combined, shall not exceed 9.80 tons per rolling, 12-month period for any individual HAP or 24.0 tons per rolling, 12-month period for any combination of HAPS.

   Applicable Compliance Method
   Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition C.1 of this permit.

2. Formulation data or US EPA Method 24/311 shall be used to determine the OC/HAP content of the coatings.

F. Miscellaneous Requirements

None