State of Ohio Environmental Protection Agency

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

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

Application No: 03-13903

DATE: 2/25/2003

The Budd Company Plastics Division
Vinod Shah
1850 Research Dr
Troy, MI 480832167

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

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

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

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

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

CC: USEPA **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 2/25/2003**
Terms and Conditions **Effective Date: 2/25/2003**

FINAL PERMIT TO INSTALL 03-13903

Application Number:	03-13903
APS Premise Number:	0387000042
Permit Fee:	**$800**
Name of Facility:	The Budd Company Plastics Division
Person to Contact:	Vinod Shah
Address:	1850 Research Dr Troy, MI 480832167

Location of proposed air contaminant source(s) [emissions unit(s)]:
100 S Poe Rd
North Baltimore, Ohio

Description of proposed emissions unit(s):
4 paint booths.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

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

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
organic compounds (OC)	124.0
particulate emissions (PE)	4.92

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R012 - plastic parts coating operation: modification of PTI No. 03-13051 issued on May 12, 1999 to increase usage and add thermal oxidizer control	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(D)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(6)
	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)

Applicable Emissions Limitations/Control Measures	
	dioxide.
	see A.I.2.d
control requirements (see A.I.2.a)	see A.I.2.d
10.3 pounds OC/hour and 45.1 tons OC/year from the application of coating and cleanup materials in this unit (see A.I.2.b).	
0.28 pound particulate emissions (PE)/hour and 1.23 tons PE/year (see A.I.2.b).	
Visible PE shall not exceed 0 percent opacity, as a six-minute average.	
See A.I.2.c.	
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined (See A.I.2.e).	
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.	
Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon	

2. Additional Terms and Conditions

2.a The permittee shall employ best available technology (BAT) control requirements on this emissions unit. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirements of OAC rule 3745-21-07(G)(2) and (G)(6).

2.b The OC emission limitations of 10.3 pounds/hour and 45.1 tons OC/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum OC content of each coating and the control efficiency of the regenerative thermal oxidizer control device. The PE limitations of 0.28 pound/hour and 1.23 tons/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum solids content (weight percent) of each coating, the transfer efficiency of the coating (35 percent) and the control efficiency of the baffles/waterwash PE control system (99 percent). Therefore, it is not necessary to establish record keeping, reporting or compliance methods requirements to demonstrate compliance with these limitations.

2.c The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(G)(6).

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

2.e The permittee has requested a federally enforceable limitation of 124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined for purposes of avoiding PSD major source status. For purposes of federal enforceability, OC effectively restricts VOCs.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate the waterwash system whenever this emissions unit is in operation.

3. The maximum rolling 12-month usage rate of OC-containing materials for emissions units R012, R013, R014 and R015 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000} \leq 124.0$$

Where:

E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R012, R013, R014 and R015, combined:

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

   b. the quantity of each coating and cleanup material employed, in gallons;

   c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

   d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

   $$E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

   Where:

   E_n= OC emissions from an individual material (tons OC emitted/month)
   U_n= Total usage of the individual material (gallons of material/month)
   V_n= OC content, as applied (pounds OC/gallon)
   C_n= Capture efficiency (percent)
   K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring;

   e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

   $$E_M = E_1 + E_2 + E_3 + ... + E_n$$

   Where:

E_M = Monthly OC emissions, in tons/month

E_n = OC emissions from each coating and cleanup material (A.III.1.e); and,

f. the rolling, 12-month OC emission rate from emissions units R012, R013, R014 and R015, combined, calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

Where:

E_T =Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions

E_M =Monthly OC emissions (tons/month).

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedance of:

a. the maximum rolling, 12-month usage rate of OC-containing material; and,

b. the rolling, 12-month OC emission limitation for emissions units R012, R013, R014, and R015, combined.

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

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

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified above.

V. Testing Requirements

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

   a. Emission Limitation:
   124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined

   Applicable Compliance Method:
   The permittee shall demonstrate compliance with this emission limitation through the record keeping required in section A.III.1 of this permit.

   b. Emission Limitation:
   visible particulate emissions (PE) shall not exceed 0 percent opacity, as a six-minute average

   Applicable Compliance Method:
   If required, the permittee shall demonstrate compliance with this emission limitation using U.S. EPA Method 9, which is located in 40 CFR Part 60, Appendix A.

2. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. the emissions testing shall be conducted within 180 days after commencement of operation under the provisions of this permit;

b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency for OC; and,

c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

3. The test(s) 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.

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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R012 - plastic parts coating operation: modification to increase usage and add thermal oxidizer control	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(G)(6)
R013 - plastic parts coating operation: modification of PTI No. 03-13051 issued on May 12, 1999 to increase usage and add thermal oxidizer control	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures
control requirements (see A.I.2.a)
10.3 pounds OC/hour and 45.1 tons OC/year from the application of coating and cleanup materials in this unit (see A.I.2.b).
0.28 pound particulate emissions (PE)/hour and 1.23 tons PE/year (see A.I.2.b).
Visible PE shall not exceed 0 percent opacity, as a six-minute average.
See A.I.2.f.
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined (See A.I.2.e).
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
see A.I.2.d
see A.I.2.d

2. Additional Terms and Conditions

2.a The permittee shall employ best available technology (BAT) control requirements on this emissions unit. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirements of OAC rule 3745-21-07(G)(2) and (G)(6).

2.b The OC emission limitations of 10.3 pounds/hour and 45.1 tons OC/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum OC content of each coating and the control efficiency of the regenerative thermal oxidizer control device. The PE limitations of 0.28 pound/hour and 1.23 tons/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum solids content (weight percent) of each coating, the transfer efficiency of the coating (35 percent) and the control efficiency of the baffles/waterwash PE control system (99 percent). Therefore, it is not necessary to establish record keeping, reporting or compliance methods requirements to demonstrate compliance with these limitations.

2.c The emission limitation specified by this rule also includes compliance with OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D).

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

2.e The permittee has requested a federally enforceable limitation of 124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined for purposes of avoiding PSD major source status. For purposes of federal enforceability, OC effectively restricts VOCs.

2.f The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(G)(6).

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate the waterwash system whenever this emissions unit is in operation.

3. The maximum rolling 12-month usage rate of OC-containing materials for emissions units R012, R013, R014 and R015 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000} \leq 124.0$$

Where:

E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R012, R013, R014 and R015, combined:

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

   b. the quantity of each coating and cleanup material employed, in gallons;

   c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

   d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

$$E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

Where:

E_n= OC emissions from an individual material (tons OC emitted/month)
U_n= Total usage of the individual material (gallons of material/month)
V_n= OC content, as applied (pounds OC/gallon)
C_n= Capture efficiency (percent)
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring;

e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

Where:

E_M = Monthly OC emissions, in tons/month

E_n = OC emissions from each coating and cleanup material (A.III.1.e); and,

f. the rolling, 12-month OC emission rate from emissions units R012, R013, R014 and R015, combined, calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

Where:

E_T =Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions

E_M =Monthly OC emissions (tons/month).

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedance of:

a. the maximum rolling, 12-month usage rate of OC-containing material; and,

b. the rolling, 12-month OC emission limitation for emissions units R012, R013, R014, and R015, combined.

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

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

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified above.

V. Testing Requirements

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

a. Emission Limitation:
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation through the record keeping required in section A.III.1 of this permit.

b. Emission Limitation:
visible particulate emissions (PE) shall not exceed 0 percent opacity, as a six-minute average

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation using

U.S. EPA Method 9, which is located in 40 CFR Part 60, Appendix A.

2. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. the emissions testing shall be conducted within 180 days after commencement of operation under the provisions of this permit;

   b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency for OC; and,

   c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

      The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

      The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

3. The test(s) 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.

   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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R013 - plastic parts coating operation: modification to increase usage and add thermal oxidizer control	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(G)(6)
R014 - plastic parts coating operation: modification of PTI No. 03-13051 issued on May 12, 1999 to increase usage and add thermal oxidizer control	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
	dioxide.
	see A.I.2.d
control requirements (see A.I.2.a)	see A.I.2.d
10.3 pounds OC/hour and 45.1 tons OC/year from the application of coating and cleanup materials in this unit (see A.I.2.b).	
0.28 pound particulate emissions (PE)/hour and 1.23 tons PE/year (see A.I.2.b).	
Visible PE shall not exceed 0 percent opacity, as a six-minute average.	
See A.I.2.f.	
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined (See A.I.2.e).	
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.	
Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon	

2. Additional Terms and Conditions

2.a The permittee shall employ best available technology (BAT) control requirements on this emissions unit. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirements of OAC rule 3745-21-07(G)(2) and (G)(6).

2.b The OC emission limitations of 10.3 pounds/hour and 45.1 tons OC/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum OC content of each coating and the control efficiency of the regenerative thermal oxidizer control device. The PE limitations of 0.28 pound/hour and 1.23 tons/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum solids content (weight percent) of each coating, the transfer efficiency of the coating (35 percent) and the control efficiency of the baffles/waterwash PE control system (99 percent). Therefore, it is not necessary to establish record keeping, reporting or compliance methods requirements to demonstrate compliance with these limitations.

2.c The emission limitation specified by this rule also includes compliance with OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D).

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

2.e The permittee has requested a federally enforceable limitation of 124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined for purposes of avoiding PSD major source status. For purposes of federal enforceability, OC effectively restricts VOCs.

2.f The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(G)(6).

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate the waterwash system whenever this emissions unit is in operation.

3. The maximum rolling 12-month usage rate of OC-containing materials for emissions units R012, R013, R014 and R015 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000} \leq 124.0$$

Where:

E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R012, R013, R014 and R015, combined:

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

   b. the quantity of each coating and cleanup material employed, in gallons;

   c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

   d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

   $$E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

   Where:

   E_n= OC emissions from an individual material (tons OC emitted/month)
   U_n= Total usage of the individual material (gallons of material/month)
   V_n= OC content, as applied (pounds OC/gallon)
   C_n= Capture efficiency (percent)
   K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring;

   e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

Where:

E_M = Monthly OC emissions, in tons/month

E_n = OC emissions from each coating and cleanup material (A.III.1.e); and,

f. the rolling, 12-month OC emission rate from emissions units R012, R013, R014 and R015, combined, calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

Where:

E_T =Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions

E_M =Monthly OC emissions (tons/month).

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedance of:

   a. the maximum rolling, 12-month usage rate of OC-containing material; and,

   b. the rolling, 12-month OC emission limitation for emissions units R012, R013, R014, and R015, combined.

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

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

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified above.

V. Testing Requirements

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

   a. Emission Limitation:
   124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined

   Applicable Compliance Method:
   The permittee shall demonstrate compliance with this emission limitation through the record keeping required in section A.III.1 of this permit.

   b. Emission Limitation:
   visible particulate emissions (PE) shall not exceed 0 percent opacity, as a six-minute

average

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation using U.S. EPA Method 9, which is located in 40 CFR Part 60, Appendix A.

2. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. the emissions testing shall be conducted within 180 days after commencement of operation under the provisions of this permit;

   b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency for OC; and,

   c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

   The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

   The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

3. The test(s) 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.

   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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R014 - plastic parts coating operation: modification to increase usage and add thermal oxidizer control	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(G)(6)
R015 - plastic parts coating operation: modification of PTI No. 03-13051 issued on May 12, 1999 to increase usage and add thermal oxidizer control	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
	dioxide.
	see A.I.2.d
control requirements (see A.I.2.a)	see A.I.2.d
10.3 pounds OC/hour and 45.1 tons OC/year from the application of coating and cleanup materials in this unit (see A.I.2.b).	
0.28 pound particulate emissions (PE)/hour and 1.23 tons PE/year (see A.I.2.b).	
Visible PE shall not exceed 0 percent opacity, as a six-minute average.	
See A.I.2.f.	
124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined (See A.I.2.e).	
Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.	
Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon	

2. Additional Terms and Conditions

2.a The permittee shall employ best available technology (BAT) control requirements on this emissions unit. BAT has been determined to be the use of a regenerative thermal oxidizer which meets the requirements of OAC rule 3745-21-07(G)(2) and (G)(6).

2.b The OC emission limitations of 10.3 pounds/hour and 45.1 tons OC/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum OC content of each coating and the control efficiency of the regenerative thermal oxidizer control device. The PE limitations of 0.28 pound/hour and 1.23 tons/year represent the unit's potential to emit based on the maximum quantity of each coating material employed, the maximum solids content (weight percent) of each coating, the transfer efficiency of the coating (35 percent) and the control efficiency of the baffles/waterwash PE control system (99 percent). Therefore, it is not necessary to establish record keeping, reporting or compliance methods requirements to demonstrate compliance with these limitations.

2.c The emission limitation specified by this rule also includes compliance with OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D).

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

2.e The permittee has requested a federally enforceable limitation of 124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined for purposes of avoiding PSD major source status. For purposes of federal enforceability, OC effectively restricts VOCs.

2.f The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(G)(6).

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate the waterwash system whenever this emissions unit is in operation.

3. The maximum rolling 12-month usage rate of OC-containing materials for emissions units R012, R013, R014 and R015 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000} \leq 124.0$$

Where:

E_n= OC emissions from an individual material (tons OC emitted/month);
U_n= Total usage of the individual material (gallons of material/month);
V_n= OC content, as applied (pounds OC/gallon);
C_n= Capture efficiency (percent);
K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for each coating and cleanup material employed in emissions units R012, R013, R014 and R015, combined:

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

   b. the quantity of each coating and cleanup material employed, in gallons;

   c. the OC content of each coating and cleanup material, in pounds/gallon, as applied;

   d. the OC emissions for each coating and cleanup material employed, in tons/month, calculated as follows:

   $$E_n = \frac{[U_n \times V_n \times (C_n/100) \times (1-(K/100))] + [U_n \times V_n \times (1-(C_n/100))]}{2000}$$

   Where:

   E_n= OC emissions from an individual material (tons OC emitted/month)
   U_n= Total usage of the individual material (gallons of material/month)
   V_n= OC content, as applied (pounds OC/gallon)
   C_n= Capture efficiency (percent)
   K = Destruction efficiency as determined during the most recent performance test and maintained via parametric monitoring;

   e. the total OC emission rate for all coatings and cleanup materials employed, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

Where:

E_M = Monthly OC emissions, in tons/month

E_n = OC emissions from each coating and cleanup material (A.III.1.e); and,

f. the rolling, 12-month OC emission rate from emissions units R012, R013, R014 and R015, combined, calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

Where:

E_T =Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions

E_M =Monthly OC emissions (tons/month).

2. The permittee shall maintain daily records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedance of:

   a. the maximum rolling, 12-month usage rate of OC-containing material; and,

   b. the rolling, 12-month OC emission limitation for emissions units R012, R013, R014, and R015, combined.

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

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

3. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer does not comply with the temperature limitation specified above.

V. Testing Requirements

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

   a. Emission Limitation:
   124.0 tons OC/rolling, 12-month period from emissions units R012, R013, R014 and R015, combined

   Applicable Compliance Method:
   The permittee shall demonstrate compliance with this emission limitation through the record keeping required in section A.III.1 of this permit.

   b. Emission Limitation:
   visible particulate emissions (PE) shall not exceed 0 percent opacity, as a six-minute average

   Applicable Compliance Method:
   If required, the permittee shall demonstrate compliance with this emission limitation using U.S. EPA Method 9, which is located in 40 CFR Part 60, Appendix A.

2. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. the emissions testing shall be conducted within 180 days after commencement of operation under the provisions of this permit;

   b. the emission testing shall be conducted to demonstrate compliance with the destruction efficiency for OC; and,

   c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

      The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

      The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

3. The test(s) 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.

   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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R015 - plastic parts coating operation: modification to increase usage and add thermal oxidizer control	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None