



State of Ohio Environmental Protection Agency

RE: DRAFT 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: 03-13335

DATE: 7/11/00

Uretech International, Inc
Paul Skotynsky
21200 Luckey Road
Luckey, OH 43443

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$2000 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
MI

NWDO
Toledo Metro Area Coun of Govt

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 03-13335

Application Number: 03-13335
APS Premise Number: 0387000110
Permit Fee: **To be entered upon final issuance**
Name of Facility: Uretech International, Inc
Person to Contact: Paul Skotynsky
Address: 21200 Luckey Road
Luckey, OH 43443

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

**21200 Luckey Road
Luckey, Ohio**

Description of proposed emissions unit(s):

Plastic and metal parts coating lines modification.

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

Uretech International, Inc

Facility ID: 0387000110

PTI Application: 03-13335

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- 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

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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

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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.

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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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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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 Related to Monitoring and Recordkeeping 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

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

4. 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.

5. 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.

6. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. Best Available Technology

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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.

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10. 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.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 97.0 |

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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

1. The permit to install for this emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate

TLV (mg/m³): 0.0344

Maximum Hourly Emission Rate (lbs/hr): 0.0020

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.249

MAGLC (ug/m³): 0.8191

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | Use of dry filtration system 402.96 lbs VOC/day, 73.54 tons VOC/year from the use of coating materials. 181.5 lbs VOC/month, 1.09 tons VOC/year from the use of cleanup materials. 0.54 lbs PE/hr, 2.37 tons PE/year 0% opacity as a 6-minute average. |
| | OAC Rule 3745-31-05 (D) | Group Limit: 97 tons OC per rolling 365-day period. (See A.I.2.a.) |
| | OAC Rule 3745-21-09 (U)(1)(c) | 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating. |
| | OAC Rule 3745-21-07 (G)(2) | See A.II.2. See A.I.2.b. |
| | OAC Rule 3745-17-11 | See A.I.2.b. |
| | OAC Rule 3745-17-07 (A)(1 - 3) | |

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

- i. Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- ii. The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts**.
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts**. "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003,

Emissions Unit ID: R002

R004, R006, R007, R010, R012, R013, R014 and R018 for plastic parts coating operations:

- a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
- a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be

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sent to the Director (the appropriate District Office of local air agency) within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

Emissions Unit ID: R002

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum

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operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R002

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretec
PTI A

Emissions Unit ID: R003

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

Applicable Emissions
Limitations/Control
Measures

Use of dry filtration system

402.96 lbs VOC/day,
73.54 tons VOC/year from
the use of coating
materials.

181.5 lbs VOC/month,
1.09 tons VOC/year from
the use of cleanup
materials.

0.54 lbs PE/hr, 2.37 tons
PE/year

0% opacity as a 6-minute
average.

Group Limit:
97 tons OC per rolling
365-day period. (See
A.I.2.a.)

3.5 lbs VOC per gallon of
coating, excluding water
and exempt solvents for an
extreme performance
coating.

See A.II.2.

See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for

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the purposes of establishing the company as a PSD minor facility:

- 2.b** Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.c** The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts**.
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts**. "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for plastic parts coating operations:
 - a. The name and company identification for each liquid organic material employed .
 - b. documentation on whether or not each liquid organic material employed is a

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photochemically reactive material

3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be

Emissions Unit ID: R003

sent to the Director (the appropriate District Office of local air agency) within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

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0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{particulate matter emissions rate (lbs/hr)}$$
$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum

Emissions Unit ID: R003

operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

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Emissions Unit ID: R003

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R003

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R004

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

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Emissions Unit ID: R004

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Applicable Emissions

Limitations/Control

Measures

Use of dry filtration system

402.96 lbs VOC/day,
73.54 tons VOC/year from
the use of coating
materials.

181.5 lbs VOC/month,
1.09 tons VOC/year from
the use of cleanup
materials.

0.54 lbs PE/hr, 2.37 tons
PE/year

0% opacity as a 6-minute
average.

Group Limit:

97 tons OC per rolling
365-day period. (See
A.I.2.a.)

3.5 lbs VOC per gallon of
coating, excluding water
and exempt solvents for an
extreme performance
coating.

See A.II.2.

See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:
- 2.b.** Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.
- Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.
- 2.c** The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts.**
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts.** "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
 - a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a

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photochemically reactive material

3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be

Emissions Unit ID: R004

sent to the Director (the appropriate District Office of local air agency) within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

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0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour \times (1-TE) \times (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum

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operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R004

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretex
PTI A

Emissions Unit ID: R006

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

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Emissions Unit ID: R006

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Applicable Emissions

Limitations/Control

Measures

Use of dry filtration system

402.96 lbs VOC/day,
73.54 tons VOC/year from
the use of coating
materials.

181.5 lbs VOC/month,
1.09 tons VOC/year from
the use of cleanup
materials.

0.54 lbs PE/hr, 2.37 tons
PE/year

0% opacity as a 6-minute
average.

Group Limit:

97 tons OC per rolling
365-day period. (See
A.I.2.a.)

3.5 lbs VOC per gallon of
coating, excluding water
and exempt solvents for an
extreme performance
coating.

See A.II.2.

See A.I.2.b.

See A.I.2.b.

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2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

2.c The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts.**

2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts.** "Photochemically reactive" is defined on OAC Rule 3745-21-01.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating

Emissions Unit ID: R006

operations:

- a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
 - a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
 3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
- f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*

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4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

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Emissions Unit ID: R006

Issued: To be entered upon final issuance

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

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Emissions Unit ID: R006

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R006

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a 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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | Use of dry filtration system 402.96 lbs VOC/day, 73.54 tons VOC/year from the use of coating materials. 181.5 lbs VOC/month, 1.09 tons VOC/year from the use of cleanup materials. 0.54 lbs PE/hr, 2.37 tons PE/year 0% opacity as a 6-minute average. |
| | OAC Rule 3745-31-05 (D) | Group Limit: 97 tons OC per rolling 365-day period. (See A.I.2.a.) |
| | OAC Rule 3745-21-09 (U)(1)(c) | 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating. |
| | OAC Rule 3745-21-07 (G)(2) | See A.II.2. See A.I.2.b. |
| | OAC Rule 3745-17-11 | See A.I.2.b. |
| | OAC Rule 3745-17-07 (A)(1 - 3) | |

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

2.c The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts.**

2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts.** "Photochemically reactive" is defined on OAC Rule 3745-21-01.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:

Emissions Unit ID: R007

- a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
- a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
- a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

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Emissions Unit ID: R007

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit

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shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

Emissions Unit ID: R007

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

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Emissions Unit ID: R007

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R007

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R010

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

Applicable Emissions
Limitations/Control
Measures

Use of dry filtration system

402.96 lbs VOC/day,
73.54 tons VOC/year from
the use of coating
materials.

181.5 lbs VOC/month,
1.09 tons VOC/year from
the use of cleanup
materials.

0.54 lbs PE/hr, 2.37 tons
PE/year

0% opacity as a 6-minute
average.

Group Limit:
97 tons OC per rolling
365-day period. (See
A.I.2.a.)

3.5 lbs VOC per gallon of
coating, excluding water
and exempt solvents for an
extreme performance
coating.

See A.II.2.
See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for

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Emissions Unit ID: R010

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the purposes of establishing the company as a PSD minor facility:

- 2.b** Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.c** The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts**.
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts**. "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
- a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material

3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:

- a. The company identification for each coating and cleanup material employed;
- b. The VOC content of each coating and cleanup material, employed in pounds per gallon;
- c. The number of gallons of each coating and cleanup material employed;
- d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
- f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*

Emissions Unit ID: R010

4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup

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material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

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Emissions Unit ID: R010

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R010

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R012

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

Uretec

PTI A

Emissions Unit ID: R012

Issued: To be entered upon final issuance

Applicable Emissions

Limitations/Control

Measures

Use of dry filtration system

402.96 lbs VOC/day,
73.54 tons VOC/year from
the use of coating
materials.

181.5 lbs VOC/month,
1.09 tons VOC/year from
the use of cleanup
materials.

0.54 lbs PE/hr, 2.37 tons
PE/year

0% opacity as a 6-minute
average.

Group Limit:

97 tons OC per rolling
365-day period. (See
A.I.2.a.)

3.5 lbs VOC per gallon of
coating, excluding water
and exempt solvents for an
extreme performance
coating.

See A.II.2.

See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

2.c The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts.**

2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts.** "Photochemically reactive" is defined on OAC Rule 3745-21-01.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:

a. The name and identification number of each coating.

b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
- a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material

3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:

- a. The company identification for each coating and cleanup material employed;
- b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
- c. The number of gallons of each coating and cleanup material employed;
- d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
- f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*

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4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Issued: To be entered upon final issuanceApplicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Uretech International, Inc
PTI Application: 02 12225
Issued

Facility ID: 0387000110

Emissions Unit ID: R012

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R012

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretec
PTI A

Emissions Unit ID: R013

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

Uretec

PTI A

Emissions Unit ID: R013

Issued: To be entered upon final issuance

Applicable Emissions

Limitations/Control

Measures

Use of dry filtration system

402.96 lbs VOC/day, 73.54 tons VOC/year from the use of coating materials.

181.5 lbs VOC/month, 1.09 tons VOC/year from the use of cleanup materials.

0.54 lbs PE/hr, 2.37 tons PE/year

0% opacity as a 6-minute average.

Group Limit:

97 tons OC per rolling 365-day period. (See A.I.2.a.)

3.5 lbs VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating.

See A.II.2.

See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:
- 2.b** Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.
- Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.
- 2.c** The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts.**
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts.** "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.

- b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
 - a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
 3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

Uretec

PTI A

Emissions Unit ID: R013

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit

shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

Issued: To be entered upon final issuance5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Uretec

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Emissions Unit ID: R013

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R013

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R014

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

2.c The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts**.

2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts**. "Photochemically reactive" is defined on OAC Rule 3745-21-01.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:

Emissions Unit ID: R014

- a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
 - a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
 3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, employed in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

Uretec

PTI A

Emissions Unit ID: R014

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Issued: To be entered upon final issuance

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Uretec**PTI A**

Emissions Unit ID: R014

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R014

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Uretec

PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC Rule 3745-17-07 (A)(1 - 3) |
|--|--------------------------------------|--------------------------------|
| Steel/Plastic Parts Paint Spray Booth (modification involves establishing a combined group limit for emission units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018) | OAC Rule 3745-31-05(A)(3) | |
| | OAC Rule 3745-31-05 (D) | |
| | OAC Rule 3745-21-09 (U)(1)(c) | |
| | OAC Rule 3745-21-07 (G)(2) | |
| | OAC Rule 3745-17-11 | |

Uretech International, Inc
PTI Application: 02 12225
Issued

Facility ID: 0387000110

Emissions Unit ID: R018

Applicable Emissions
Limitations/Control
Measures

Use of dry filtration system

402.96 lbs VOC/day,
 73.54 tons VOC/year from
 the use of coating
 materials.

181.5 lbs VOC/month,
 1.09 tons VOC/year from
 the use of cleanup
 materials.

0.54 lbs PE/hr, 2.37 tons
 PE/year

0% opacity as a 6-minute
 average.

Group Limit:
 97 tons OC per rolling
 365-day period. (See
 A.I.2.a.)

3.5 lbs VOC per gallon of
 coating, excluding water
 and exempt solvents for an
 extreme performance
 coating.

See A.II.2.
 See A.I.2.b.

See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a

Uretec

PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

PSD minor facility:

- 2.b** Combined annual VOC emissions from coating and cleanup operations from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 shall not exceed 97.0 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.c** The limits established pursuant to this rule are less stringent than those established in accordance with OAC Rule 3745-31-05

II. Operational Restrictions

1. The permittee shall only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(c) (3.5 lbs VOC/gallon excluding water and exempt solvents) in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 on an "as applied" basis **when coating metal parts**.
2. The permittee shall only employ coatings which are "non-photochemically reactive" **when coating plastic parts**. "Photochemically reactive" is defined on OAC Rule 3745-21-01.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 for metal parts coating operations:
 - a. The name and identification number of each coating.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

- 2. The permittee shall maintain records of the following information for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 when coating plastic parts:
 - a. The name and company identification for each liquid organic material employed.
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material
- 3. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, as applied in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day (b x c);

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
 - f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*
- 4. The permittee shall maintain daily records that document any time periods when the dry filtration was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office of local air agency) in writing of any daily record showing that the dry filtration 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 of local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which identify exceedances of the annual emission limitations for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018.
4. The permittee shall submit deviation (excursion) reports which identify any time during which a photochemically reactive material was employed while coating plastic parts.

V. Testing Requirements

1. Emission Limitations:

97.0 TPY based on a rolling, 365-day summation of VOC input rates from all coating and cleanup materials

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

3.5 lbs VOC/gallon excluding water and exempt solvents for all other coating materials when coating metal parts.

Applicable Compliance Method:

The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied, including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the

Uretec
PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.54 lb/hr particulate emissions, 2.37 tons/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average except as provided by rule.

Applicable Compliance Method:

U.S. EPA Reference Method 9 (40 CFR Part 60, Appendix A).

5. Emission Limitation:

402.96 lbs VOC/day, 73.54 tons VOC/year.

Applicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/day limitation by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitations, compliance will also be shown with the annual limitation.

The potential to emit for this emissions unit is based on a maximum gallon usage of 105 gallons per day and a maximum VOC content of 3.48 lbs/gallon.

6. Emission Limitation:

181.5 lbs VOC/month, 1.09 tons VOC/year.

Uretec**PTI A**

Emissions Unit ID: R018

Issued: To be entered upon final issuanceApplicable Compliance Method:

The daily VOC emission limitation is based on the emissions units potential-to-emit (*). Therefore no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

The ton per year limitation was developed by multiplying the lbs/month limitation by a maximum operating schedule of 12 months per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the monthly limitations, compliance will also be shown with the annual limitation.

The potential to emit is based on a maximum gallon usage of 25 gallons cleanup per month and a maximum VOC content of 7.26 lbs/gallon.

VI. Miscellaneous Requirements

None

Uretec
PTI A

Emissions Unit ID: R018

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Steel/Plastic Parts Spray Booth | | |

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335 Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines modification CITY/TWP Luckey

SIC CODE 3086 SCC CODE 4-02-025-01 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Plastic and Steel Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Plastic and Steel Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE

4-02-025-01

EMISSIONS UNIT ID

R004

EMISSIONS UNIT DESCRIPTION Plastic and Steel Parts Spray Booth

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R007

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R010

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R012

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R013

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R014

EMISSIONS UNIT DESCRIPTION Plastics and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Numerous

1 NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

SIC CODE 3086

SCC CODE 4-02-025-01

EMISSIONS UNIT ID R018

EMISSIONS UNIT DESCRIPTION Plastic and Metal Parts Spray Booth

DATE INSTALLED Modification

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|--------------------|-----------------|--------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.54 | 2.37 | 0.54 | 2.37 |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 402.96 lbs/day | 97.0 (group limit) | 402.96 lbs/day | 97.0 (group limit) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of dry filters and compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Numerous

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

| | Electronic | <u>Additional information</u> File Name Convention (your PTI # plus this letter) | Hard Copy | None |
|--|-------------------------------------|--|-------------------------------------|-------------------------------------|
| <u>Calculations (required)</u> | <input checked="" type="checkbox"/> | 0000000c.wpd | <input type="checkbox"/> | |
| Modeling form/results | <input type="checkbox"/> | 0000000s.wpd | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| PTI Application (complete or partial)* | <input type="checkbox"/> | 0000000a.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| BAT Study | <input type="checkbox"/> | 0000000b.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other/misc. | <input type="checkbox"/> | 0000000t.wpd | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

This is a modification to several existing coating lines at this facility. The purpose of this modification is to establish grouped limitations and alter the recordkeeping requirements in order to allow the facility critical flexibility in using various spray booths. Due to the large amount of coatings, and the fact that multiple materials are coated, usage/input restrictions are not feasible. Per NSR guidance, daily recordkeeping is used in place of input restrictions.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

Uretech Inc. operates a coating operation in Luckey, OH which consists of 10 coating operation and, is proposing to change recordkeeping requirements and consolidate emissions for all ten booths.

B. Facility Emissions/Attainment Status

The facility is a major stationary source for VOC for Title V, and not for PSD. Wood County is attainment/unclassifiable for the above pollutants. The plant has minor emissions of the other criteria pollutants.

C. New Source Emissions

Potential VOC emissions from the 10 spray booths are:

| EU | VOC in lbs/hr | VOC in TPY |
|------|---------------|------------|
| R002 | 16.79 | 73.54 |
| R003 | 16.79 | 73.54 |
| R004 | 16.79 | 73.54 |

NEW SOURCE REVIEW FORM B

PTI Number: 03-13335

Facility ID: 0387000110

FACILITY NAME Uretech International, Inc.

FACILITY DESCRIPTION Plastic and metal parts coating lines

CITY/TWP Luckey

Emissions Unit ID: R018

| | | |
|--------|--------------|--------------|
| R006 | 16.79 | 73.54 |
| R007 | 16.79 | 73.54 |
| R010 | 16.79 | 73.54 |
| R012 | 16.79 | 73.54 |
| R013 | 16.79 | 73.54 |
| R014 | 16.79 | 73.54 |
| R018 | 16.79 | 73.54 |
| Totals | 167.9 | 735.4 |

Uretech, Inc. has proposed to limit the emissions of these spray booths to a total of 97.0 TPY which will reduce potential emissions in order to establish the facility as a PSD minor facility. With these federally enforceable operating restrictions the potential to emit will be: **97.0 TPY** for all spray booths combined.

D. Conclusion:

This permit modification does not result in any increase in net VOC emissions from this facility. However, in the absence of federally enforceable terms and conditions, Uretech would be considered a PSD major facility based on potential emissions. With emission restrictions for R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, the company will be a PSD minor facility.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 97.0 |