



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL  
WOOD COUNTY

CERTIFIED MAIL

Street Address:

Mailing Address:  
Lazarus Gov. Center

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

Application No: 03-13436

DATE: 10/5/2000

Cooper Engineered Products  
Heather Beery  
1175 N Main St  
Bowling Green, OH 43402

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 \$1400 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  
IN

NWDO  
M

Toledo Metro Area Coun of Gov



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

**DRAFT PERMIT TO INSTALL 03-13436**

Application Number: 03-13436  
APS Premise Number: 0387020045  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cooper Engineered Products  
Person to Contact: Heather Beery  
Address: 1175 N Main St  
Bowling Green, OH 43402

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

**1175 N. Main St.  
Bowling Green, Ohio**

Description of proposed emissions unit(s):

**Cured Rubber Seals Coating Line - Cascade Lines 2 and 3.**

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

**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.

**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**

**Cooper Engineered Products**

**PTI Application: 03-13436**

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**Facility ID: 0387020045**

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>
OC	13.0
PE	1.6

**Cooper Engineered Products**

**Facility ID: 0387020045**

**PTI Application: 03-13436**

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

**None**

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

**None**

Coope  
PTI A

Emissions Unit ID: P055

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P055 - Primer Curing Oven - Cascade Line 2 Oven 2.	OAC rule 3745-31-05 (A)(3)	See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R009, P055, R030, and P056: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)(3)	Combined limit for emissions units P055 and P056: 3 lbs OC/hr, 15 lbs OC/day See A.I.2.c.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule include compliance with the requirement of OAC rule 3745-21-07 (G)(3) and OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units R009, P055, R030, and P056 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c In accordance with OAC rule 3745-21-07 (G)(3), emissions units P055 and P056 are collectively subject to compliance with OAC rule 3745-21-07 (G)(1).

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**Coope  
PTI A**

Emissions Unit ID: P055

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**2.d** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

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**II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R009, P055, R030, and P056 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R030, and P056 shall not exceed 2.15 pounds OC per gallon, as applied.

**III. Monitoring and/or Recordkeeping Requirements**

1. For purposes of calculating the combined OC emission rate for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in

Emissions Unit ID: P055

the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

2. In order to demonstrate compliance with the emissions limits of 3 pounds OC per hour and 15 pounds OC per day, the permittee shall collect and record the following information for each day for ovens P055 and P056:
  - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emissions rate for all coatings employed in the coating operation associated with each emissions unit, multiplied by the maximum percentage of the emissions associated with each emissions unit, in pounds per day;
  - b. number of operating hours, in hours per day;
  - c. the combined, daily OC emissions from emissions units P055 and P056, in pounds per day; and
  - d. the combined, hourly OC emissions from emissions units P055 and P056, in pounds per hour (divide c by b).
  
3. In order to demonstrate compliance with the emissions limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

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4. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
    - ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. the annual gallon usage restrictions and emission limitation for emissions units R009, P055, R030, and P056, combined, per rolling 12-month period; and
  - c. the OC content restrictions.
  - d. the combined OC emissions from emissions units P055 and P056 that exceeded 3 pounds OC per hour and/or 15 pounds per day.
2. Unless otherwise specified, deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

**V. Testing Requirements**

**Cooper Engineered Products**  
**PTI Application: 02 12426**  
**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: P055

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: Combined limit for emissions units P055 and P056  
3 lbs OC/hr & 15 lbs OC/day

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2.

**Cooper Engineered Products**

**PTI Application: 02 12426**

**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: P055

- b. Emission Limitation: Group limit for emissions units R009, P055, R030, and P056  
6.5 tons OC/yr

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.3. and A.III.4.

**VI. Miscellaneous Requirements**

None

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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>
P055 - Primer Curing Oven - Cascade Line 2 Oven 2.		See B.VI. below

**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**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

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modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Coope  
PTI A

Emissions Unit ID: P056

**Issued: To be entered upon final issuance**

**Part III - SP**

**ECIAL 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>
P056 - Topcoat Curing Oven - Cascade Line 2 Oven 3.	OAC rule 3745-31-05 (A)(3)	See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R009, P055, R030, and P056: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)(3)	Combined limit for emissions units P055 and P056: 3 lbs OC/hr, 15 lbs OC/day See A.I.2.c.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule include compliance with the requirement of OAC rule 3745-21-07 (G)(3) and OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units R009, P055, R030, and P056 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c In accordance with OAC rule 3745-21-07 (G)(3), emissions units P055 and P056 are collectively subject to compliance with OAC rule 3745-21-07 (G)(1).

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**Coope  
PTI A**

Emissions Unit ID: P056

**Issued: To be entered upon final issuance**

**2.d** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

**Issued: To be entered upon final issuance**

**II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R009, P055, R030, and P056 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R030, and P056 shall not exceed 2.15 pounds OC per gallon, as applied.

**III. Monitoring and/or Recordkeeping Requirements**

1. For purposes of calculating the combined OC emission rate for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are

Emissions Unit ID: P056

emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

2. In order to demonstrate compliance with the emissions limits of 3 pounds OC per hour and 15 pounds OC per day, the permittee shall collect and record the following information for each day for ovens P055 and P056:
  - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emissions rate for all coatings employed in the coating operation associated with each emissions unit, multiplied by the maximum percentage of the emissions associated with each emissions unit, in pounds per day;
  - b. number of operating hours, in hours per day;
  - c. the combined, daily OC emissions from emissions units P055 and P056, in pounds per day; and
  - d. the combined, hourly OC emissions from emissions units P055 and P056, in pounds per hour (divide c by b).
  
3. In order to demonstrate compliance with the emissions limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

**Issued: To be entered upon final issuance**

4. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
    - ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. the annual gallon usage restrictions and emission limitation for emissions units R009, P055, R030, and P056, combined, per rolling 12-month period; and
  - c. the OC content restrictions.
  - d. the combined OC emissions from emissions units P055 and P056 that exceeded 3 pounds OC per hour and/or 15 pounds per day.
2. Unless otherwise specified, deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

**V. Testing Requirements**

**Cooper Engineered Products**

**PTI Application: 02 12426**

**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: P056

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Combined limit for emissions units P055 and P056  
3 lbs OC/hr & 15 lbs OC/day  
  
Applicable Compliance Method:  
Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2.
  - b. Emission Limitation: Group limit for emissions units R009, P055, R030, and P056  
6.5 tons OC/yr  
  
Applicable Compliance Method:  
Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.3. and A.III.4.

**VI. Miscellaneous Requirements**

None

**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>
P056 - Topcoat Curing Oven - Cascade Line 2 Oven 3.		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

**Coope  
PTI A**

Emissions Unit ID: P056

**Issued: To be entered upon final issuance**

modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P057 - Primer Curing Oven - Cascade Line 3 Oven 2.	OAC rule 3745-31-05 (A)(3)	See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R007, P057, R031, and P058: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)(3)	Combined limit for emissions units P057 and P058: 3 lbs OC/hr, 15 lbs OC/day See A.I.2.c.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule include compliance with the requirement of OAC rule 3745-21-07 (G)(3) and OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units R007, P057, R031, and P058 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c In accordance with OAC rule 3745-21-07 (G)(3), emissions units P057 and P058 are collectively subject to compliance with OAC rule 3745-21-07 (G)(1).
- 2.d For purposes of federal enforceability, all OC restrictions effectively restrict VOC

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**Cooper Engineered Products**  
**PTI Application: 02 12426**  
**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: P057

emissions.

**Issued: To be entered upon final issuance****II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R007, P057, R031, and P058 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R031, and P058 shall not exceed 2.15 pounds OC per gallon, as applied.

**III. Monitoring and/or Recordkeeping Requirements**

1. For purposes of calculating the combined OC emission rate for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and

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P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

2. In order to demonstrate compliance with the emissions limits of 3 pounds OC per hour and 15 pounds OC per day, the permittee shall collect and record the following information for each day for ovens P057 and P058:
  - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emissions rate for all coatings employed in the coating operation associated with each emissions unit, multiplied by the maximum percentage of the emissions associated with each emissions unit, in pounds per day;
  - b. number of operating hours, in hours per day;
  - c. the combined, daily OC emissions from emissions units P057 and P058, in pounds per day; and
  - d. the combined, hourly OC emissions from emissions units P057 and P058, in pounds per hour (divide c by b).
  
3. In order to demonstrate compliance with the emissions limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

Emissions Unit ID: P057

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

4. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
    - ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. the annual gallon usage restrictions and emission limitation for emissions units R007, P057, R031, and P058, combined, per rolling 12-month period; and
  - c. the OC content restrictions.
  - d. the combined OC emissions from emissions units P057 and P058 that exceeded 3 pounds OC per hour and/or 15 pounds per day.
2. Unless otherwise specified, deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

#### V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions

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shall be determined in accordance with the following methods:

- a. Emission Limitation: Combined limit for emissions units P057 and P058  
3 lbs OC/hr & 15 lbs OC/day

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2.

- b. Emission Limitation: Group limit for emissions units R007, P057, R031, and P058  
6.5 tons OC/yr

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PTI A**

Emissions Unit ID: P057

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.3. and A.III.4.

**VI. Miscellaneous Requirements**

None

Coope  
PTI A

Emissions Unit ID: P057

**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>
P057 - Primer Curing Oven - Cascade Line 3 Oven 2.		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

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modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>
P058 - Topcoat Curing Oven - Cascade Line 3 Oven 3	OAC rule 3745-31-05 (A)(3)	See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R007, P057, R031, and P058: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)(3)	Combined limit for emissions units P057 and P058: 3 lbs OC/hr, 15 lbs OC/day See A.I.2.c.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule include compliance with the requirement of OAC rule 3745-21-07 (G)(3) and OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units R007, P057, R031, and P058 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c In accordance with OAC rule 3745-21-07 (G)(3), emissions units P057 and P058 are collectively subject to compliance with OAC rule 3745-21-07 (G)(1).
- 2.d For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

**Issued: To be entered upon final issuance****II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R007, P057, R031, and P058 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R031, and P058 shall not exceed 2.15 pounds OC per gallon, as applied.

**III. Monitoring and/or Recordkeeping Requirements**

1. For purposes of calculating the combined OC emission rate for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and

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P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

2. In order to demonstrate compliance with the emissions limits of 3 pounds OC per hour and 15 pounds OC per day, the permittee shall collect and record the following information for each day for ovens P057 and P058:
  - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emissions rate for all coatings employed in the coating operation associated with each emissions unit, multiplied by the maximum percentage of the emissions associated with each emissions unit, in pounds per day;
  - b. number of operating hours, in hours per day;
  - c. the combined, daily OC emissions from emissions units P057 and P058, in pounds per day; and
  - d. the combined, hourly OC emissions from emissions units P057 and P058, in pounds per hour (divide c by b).
  
3. In order to demonstrate compliance with the emissions limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

Emissions Unit ID: P058

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

4. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
    - ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. the annual gallon usage restrictions and emission limitation for emissions units R007, P057, R031, and P058, combined, per rolling 12-month period; and
  - c. the OC content restrictions.
  - d. the combined OC emissions from emissions units P057 and P058 that exceeded 3 pounds OC per hour and/or 15 pounds per day.
2. Unless otherwise specified, deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions

**Issued: To be entered upon final issuance**

shall be determined in accordance with the following methods:

- a. Emission Limitation: Combined limit for emissions units P057 and P058  
3 lbs OC/hr & 15 lbs OC/day

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2.

- b. Emission Limitation: Group limit for emissions units R007, P057, R031, and P058  
6.5 tons OC/yr

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.3. and A.III.4.

**VI. Miscellaneous Requirements**

None

**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>
P058 - Topcoat Curing Oven - Cascade Line 3 Oven 3		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

**Cooper Engineered Products**

**PTI Application: 02-12426**

**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: P058

modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
R007 - Primer Spray Booth - Cascade Line 3 Spray Booth 1.	OAC rule 3745-31-05 (A)(3)	3.43 lbs organic compound (OC)/hr Use of dry filtration
		0.10 lb particulate emissions (PE)/hr 0.4 ton PE/yr
		See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R007, P057, R031, and P058: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)	See A.II.4.
	OAC rule 3745-17-11 (B)(1)	See A.I.2.c.
	OAC rule 3745-17-07 (A)	visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average except as otherwise provided by rule

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule, also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-17-07 (A).

**Issued: To be entered upon final issuance**

- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units R007, P057, R031, and P058 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c The emission limitation based on this applicable rule is less stringent than that established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.d For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

**II. Operational Restrictions**

- 1. The maximum annual coating usage for emissions units R007, P057, R031, and P058 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

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2. The maximum OC content of the primers employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R031 and P058 shall not exceed 2.15 pounds OC per gallon, as applied.
4. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

### III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance A.II.4, the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. In order to demonstrate compliance with the emission limit of 6.5 tons OC per year, the permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

3. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:

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- i. the annual\* cumulative number of gallons of primer; (see A.II.1.); and
- ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

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

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. For the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. The annual gallon usage restrictions and emission limitation for emissions units R007, P057, R031, and P058, combined, per rolling, 12-month period; and
  - c. The OC content restrictions.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
3.43 lbs OC/hr

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## Applicable Compliance Method:

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

\*The potential to emit for this emissions unit was based on a maximum OC content of 6.35 lbs OC/gallon and a maximum hourly usage rate of 0.6 gallons/hr. A 90 percent/10 percent split between the spray booth and the oven (P057), was applied with 90 percent of the emissions emitted from the spray booth.

The "split" of OC emissions between coating and drying operations addressed above is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

- b. Emission Limitation: Group limit for emissions units R007, P057, R031, and P058  
6.5 tons OC/yr

## Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2. and A.III.3.

- c. Emission Limitation:  
0.10 lb PE/hr

## Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

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

$E = \text{maximum coating solids usage (lbs/hr)} \times (1 - TE) (1 - CE)$

where,

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 (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

If required, the permittee shall demonstrate compliance with the above emission limitation

Emissions Unit ID: R007

in accordance with 40 CFR Part 60 Appendix A, Method 5.

- d. Emission Limitation:  
0.4 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the lb/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation:  
20 percent opacity as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:  
OAC rule 3745-17-03 (B)(1)

## **VI. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-09391 which was issued on 01-18-96.

Coope  
PTI A

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>
R007 - Primer Spray Booth - Cascade Line 3 Spray Booth 1.		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less

**Issued: To be entered upon final issuance**

than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>
R009 - Primer Spray Booth - Cascade Line 2 Spray Booth 1.	OAC rule 3745-31-05 (A)(3)	3.43 lbs organic compound (OC)/hr Use of dry filtration
		0.10 lb particulate emissions (PE)/hr 0.4 ton PE/yr
		See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R009, P055, R030, and P056: 6.5 tons OC/yr See A.I.2.c.
	OAC rule 3745-21-07 (G)	See A.II.4.
	OAC rule 3745-17-11 (B)(1)	See A.I.2.d.
	OAC rule 3745-17-07 (A)	visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average except as otherwise provided by

rule

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule, also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-17-07 (A).
- 2.b** The permittee has requested a federally enforceable, combined emission limitation for emissions units R009, P055, R030, and P056 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c** The emission limitation based on this applicable rule is less stringent than that established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.d** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

## II. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, P055, R030, and P056 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

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2. The maximum OC content of the primers employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R030 and P056 shall not exceed 2.15 pounds OC per gallon, as applied.
4. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

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### III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with A.II.4., the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. In order to demonstrate compliance with the emission limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

3. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall also record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. for the first 12 months of operation under the provision of this permit:

Emissions Unit ID: R009

- i. the total cumulative number of gallons of primer (see A.II.1.); and
  - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
- b. after the first 12 months of operation under the provisions of this permit:
- i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
  - ii. the annual\* cumulative number of gallons of topcoats (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

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

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. For the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. The annual gallon usage restrictions and emission limitation for emissions units R009, P055, R030, and P056, combined, per rolling, 12-month period; and
  - c. The OC content restrictions.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

#### V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

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3.43 lbs OC/hr

**Applicable Compliance Method:**

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

\*The potential to emit for this emissions unit was based on a maximum OC content of 6.35 lbs OC/gallon and a maximum hourly usage rate of 0.6 gallons/hr. A 90 percent/10 percent split between the spray booth and the oven (P055), was applied with 90 percent of the emissions emitted from the spray booth.

The "split" of OC emissions between coating and drying operations addressed above is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

- b. Emission Limitation: Group limit for emissions units R009, P055, R030, and P056  
6.5 tons OC/yr

**Applicable Compliance Method:**

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2. and A.III.3.

- c. Emission Limitation:  
0.10 lb PE/hr

**Applicable Compliance Method:**

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

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

$$E = \text{maximum coating solids usage (lbs/hr)} \times (1 - TE) (1 - CE)$$

where,

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 (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

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If required, the permittee shall demonstrate compliance with the above emission limitation in accordance with 40 CFR Part 60 Appendix A, Method 5.

- d. Emission Limitation:  
0.4 ton PE/yr

**Applicable Compliance Method:**

The permittee shall demonstrate compliance with this emission limitation by multiplying the lb/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**Cooper Engineered Products**

**PTI Application: 03-12426**

**Issued**

**Facility ID: 0387020045**

Emissions Unit ID: R009

- e. Emission Limitation:  
20 percent opacity as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:  
OAC rule 3745-17-03 (B)(1)

**VI. Miscellaneous Requirements**

- 1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-09391 which was issued on 01-18-96.

**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>
R009 - Primer Spray Booth - Cascade Line 2 Spray Booth 1.		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less

Cooper Engineered Products

PTI Application: 03-13436

Issued: To be entered upon final issuance

Facility ID: 0387020045

Emissions Unit ID: R030

than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### 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

- 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>
R030 - Topcoat Spray Booth - Cascade Line 2 Spray Booth 2.	OAC rule 3745-31-05 (A)(3)	2.42 lbs organic compound (OC)/hr Use of dry filtration
		0.10 lb particulate emissions (PE)/hr 0.4 ton PE/yr
		See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group limit for emissions units R009, P055, R030, and P056: 6.5 tons OC/yr See A.I.2.c.
	OAC rule 3745-21-07 (G)	See A.II.4.
	OAC rule 3745-17-11 (B)(1)	See A.I.2.d.
	OAC rule 3745-17-07 (A)	visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average except as otherwise provided by

**Cooper Engineered Products**

**PTI Application: 03-13436**

**Issued: To be entered upon final issuance  
rule**

**Facility ID: 0387020045**  
Emissions Unit ID: R030

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule, also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-17-07 (A).
- 2.b** The permittee has requested a federally enforceable, combined emission limitation for emissions units R009, P055, R030, and P056 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c** The emission limitation based on this applicable rule is less stringent than that established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.d** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

## **II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R009, P055, R030, and P056 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310

**Cooper Engineered Products****PTI Application: 03-13436****Issued: To be entered upon final issuance****Facility ID: 0387020045**

Emissions Unit ID: R030

1-12

1277

2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R030 and P056 shall not exceed 2.15 pounds OC per gallon, as applied.
4. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

**Cooper Engineered Products**

**PTI Application: 03-13436**

**Issued: To be entered upon final issuance**

**Facility ID: 0387020045**

Emissions Unit ID: R030

**III. Monitoring and/or Recordkeeping Requirements**

1. In order to demonstrate compliance with A.II.4., the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. In order to demonstrate compliance with the emission limit of 6.5 tons OC/year, the permittee shall collect and record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

3. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall also record the following information each month for emissions units R009, P055, R030, and P056, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and

**Cooper Engineered Products**

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**Issued: To be entered upon final issuance**

**Facility ID: 0387020045**

Emissions Unit ID: R030

- ii. the total cumulative number of gallons of topcoat (see A.II.1.).
- b. after the first 12 months of operation under the provisions of this permit:
  - i. the annual\* cumulative number of gallons of primer (see A.II.1.); and
  - ii. the annual\* cumulative number of gallons of topcoats (see A.II.1).

\*Based upon a rolling 12-month summation of the coating input rates.

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

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

#### **IV. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
- 2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. For the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. The annual gallon usage restrictions and emission limitation for emissions units R009, P055, R030, and P056, combined, per rolling, 12-month period; and
  - c. The OC content restrictions.
- 3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

#### **V. Testing Requirements**

Cooper Engineered Products

PTI Application: 03-13436

Issued: To be entered upon final issuance

Facility ID: 0387020045

Emissions Unit ID: R030

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
2.42 lbs OC/hr

Applicable Compliance Method:

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

\*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 lbs OC/gallon and a maximum hourly usage rate of 1.25 gallons/hr. A 90 percent/10 percent split between the spray booth and the oven (P056), was applied with 90 percent of the emissions emitted from the spray booth.

The "split" of OC emissions between coating and drying operations addressed above is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

- b. Emission Limitation: Group limit for emissions units R009, P055, R030, and P056  
6.5 tons OC/yr

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2. and A.III.3.

- c. Emission Limitation:  
0.10 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

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

$E = \text{maximum coating solids usage (lbs/hr)} \times (1 - TE) (1 - CE)$

where,

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 (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

**Cooper Engineered Products**

**PTI Application: 03-13436**

**Issued: To be entered upon final issuance**

**Facility ID: 0387020045**

Emissions Unit ID: R030

If required, the permittee shall demonstrate compliance with the above emission limitation in accordance with 40 CFR Part 60 Appendix A, Method 5.

- d. Emission Limitation:  
0.4 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the lb/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation:  
20 percent opacity as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:

OAC rule 3745-17-03 (B)(1)

**VI. Miscellaneous Requirements**

None

Cooper Engineered Products  
PTI Application: 03-13436  
Issued: To be entered upon final issuance

Facility ID: 0387020045  
Emissions Unit ID: R030

**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>
R030 - Topcoat Spray Booth - Cascade Line 2 Spray Booth 2.		See B.VI. below

**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**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

Emissions Unit ID: R031

because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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>
R031 - Topcoat Spray Booth - Cascade Line 3 Spray Booth 2.	OAC rule 3745-31-05 (A)(3)	2.42 lbs organic compound (OC)/hr Use of dry filtration
	OAC rule 3745-31-05 (D)	0.10 lb particulate emissions (PE)/hr 0.4 ton PE/yr
	OAC rule 3745-31-05 (D)	See A.I.2.a.  Group limit for emissions units R007, P057, R031, and P058: 6.5 tons OC/yr See A.I.2.b.
	OAC rule 3745-21-07 (G)	See A.II.4.
	OAC rule 3745-17-11 (B)(1)	See A.I.2.c.
	OAC rule 3745-17-07 (A)	visible particulate emissions (PE) shall not exceed 20 percent opacity as a six-minute average except as otherwise provided by rule

**2. Additional Terms and Conditions**

**Issued: To be entered upon final issuance**

- 2.a** The requirements of this rule, also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-17-07 (A).
- 2.b** The permittee has requested a federally enforceable, combined emission limitation for emissions units R007, P057, R031, and P058 of 6.5 tons OC per year based on OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (See A.II.1. - A.II.3.).
- 2.c** The emission limitation based on this applicable rule is less stringent than that established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.d** For purposes of federal enforceability, all OC restrictions effectively restrict VOC emissions.

**II. Operational Restrictions**

1. The maximum annual coating usage for emissions units R007, P057, R031, and P058 shall not exceed 1,277 gallons of primer and 2,310 gallons of topcoat based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Gallon Usage</u>	
	<u>Primer</u>	<u>Topcoat</u>
1	300	600
1-2	400	800
1-3	500	1000
1-4	600	1200
1-5	700	1400
1-6	800	1600
1-7	900	1800
1-8	1000	2000
1-9	1100	2200
1-10	1277	2310
1-11	1277	2310
1-12	1277	2310

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of

**Issued: To be entered upon final issuance**

the coating usage rates.

2. The maximum OC content of the primers employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.
3. The maximum OC content of the topcoats employed in emissions units R031 and P058 shall not exceed 2.15 pounds OC per gallon, as applied.
4. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

### III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance A.II.4, the permittee shall maintain records of the following information for this emissions unit:
  - a. The company identification for each liquid organic material employed in this emissions unit; and
  - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. In order to demonstrate compliance with the emission limit of 6.5 tons OC per year, the permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the OC emissions rate for each coating employed (b x c), in tons per month;
  - e. the total OC emissions rate for all coatings (summation of d), in tons per month;
  - f. the rolling 12-month total OC emission rate, in tons, based on a rolling, 12-month summation.

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

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

3. In order to demonstrate compliance with the annual coating usage restrictions of 1,277 gallons of primer and 2,310 gallons of topcoat, the permittee shall record the following information each month for emissions units R007, P057, R031, and P058, as a group:
  - a. for the first 12 months of operation under the provision of this permit:
    - i. the total cumulative number of gallons of primer (see A.II.1.); and
    - ii. the total cumulative number of gallons of topcoat (see A.II.1.).
  - b. after the first 12 months of operation under the provisions of this permit:

**Issued: To be entered upon final issuance**

- i. the annual\* cumulative number of gallons of primer; (see A.II.1.); and
- ii. the annual\* cumulative number of gallons of topcoat (see A.II.1.).

\*Based upon a rolling 12-month summation of the coating input rates.

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

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

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. For the first 12 calendar months of operation, all exceedances of the maximum allowable gallon usage rates;
  - b. The annual gallon usage restrictions and emission limitation for emissions units R007, P057, R031, and P058, combined, per rolling, 12-month period; and
  - c. The OC content restrictions.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

**V. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

**Issued: To be entered upon final issuance**

2.42 lbs OC/hr

**Applicable Compliance Method:**

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

\*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 lbs OC/gallon and a maximum hourly usage rate of 1.25 gallons/hr. A 90 percent/10 percent split between the spray booth and the oven (P058), was applied with 90 percent of the emissions emitted from the spray booth.

The "split" of OC emissions between coating and drying operations addressed above is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996.

- b. Emission Limitation: Group limit for emissions units R007, P057, R031, and P058  
6.5 tons OC/yr

**Applicable Compliance Method:**

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in A.III.2. and A.III.3.

- c. Emission Limitation:  
0.10 lb PE/hr

**Applicable Compliance Method:**

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

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

$$E = \text{maximum coating solids usage (lbs/hr)} \times (1 - TE) (1 - CE)$$

where,

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 (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

Emissions Unit ID: R031

If required, the permittee shall demonstrate compliance with the above emission limitation in accordance with 40 CFR Part 60 Appendix A, Method 5.

- d. Emission Limitation:  
0.4 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the lb/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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**Coope  
PTI A**

Emissions Unit ID: R031

**Issued: To be entered upon final issuance**

- e. Emission Limitation:  
20 percent opacity as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:  
OAC rule 3745-17-03 (B)(1)

**VI. Miscellaneous Requirements**

None

Coope  
PTI A

Emissions Unit ID: R031

**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>
R031 - Topcoat Spray Booth - Cascade Line 3 Spray Booth 2.		See B.VI. below

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less

**Issued: To be entered upon final issuance**

than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line -  
Cascade Lines 2 and 3.

CITY/TWP Bowling Green

SIC CODE 3069

SCC CODE 4-02-010-01

EMISSIONS UNIT ID P055

EMISSIONS UNIT DESCRIPTION Primer Curing Oven - Cascade Line 2 Oven 2.

DATE INSTALLED 3/01

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	0.38 lb OC/hr	1.4 tons OC/yr		
Combined OC for P055 and P056				3 lbs OC/hr 15 lbs OC/day	
Combined OC for R009, P055, R030, & P056					6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? No PSD? No OFFSET POLICY? No

No

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

**Enter Determination** Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

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

**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\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line -

CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069

SCC CODE 4-02-010-01

EMISSIONS UNIT ID P056

EMISSIONS UNIT DESCRIPTION Topcoat Curing Oven - Cascade Line 2 Oven 3.

DATE INSTALLED 5/01

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	0.27 lb OC/hr	1.0 tons OC/yr		
Combined OC for P055 and P056				3 lbs OC/hr 15 lbs OC/day	
Combined OC for R009, P055, R030, & P056					6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Enter Determination Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436 Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line - CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069 SCC CODE 4-02-010-01 EMISSIONS UNIT ID P057

EMISSIONS UNIT DESCRIPTION Primer Curing Oven - Cascade Line 3 Oven 2.

DATE INSTALLED 7/01

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	0.38 lb OC/hr	1.4 tons OC/yr		
Combined OC for P057 and P058				3 lbs OC/hr 15 lbs OC/day	
Combined OC for R007, P057, R031, & P058					6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? No PSD? No OFFSET POLICY? No

No

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

**Enter Determination** Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436 Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line - CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069 SCC CODE 4-02-010-01 EMISSIONS UNIT ID P058

EMISSIONS UNIT DESCRIPTION Topcoat Curing Oven - Cascade Line 3 Oven 3

DATE INSTALLED 7/01

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	0.27 lb OC/hr	1.0 tons OC/yr		
Combined OC for P057 and P058				3 lbs OC/hr 15 lbs OC/day	
Combined OC for R007, P057, R031, & P058					6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? No PSD? No OFFSET POLICY? No

No

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

**Enter Determination** Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436 Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line - CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069 SCC CODE 4-02-006-01 EMISSIONS UNIT ID R007

EMISSIONS UNIT DESCRIPTION Primer Spray Booth - Cascade Line 3 Spray Booth 1.

DATE INSTALLED 6/84

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	0.003 lb PE/hr	0.003 ton PE/yr	0.10 lb PE/hr	0.4 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	3.14 lbs OC/hr	3.16 tons OC/yr	3.43 lbs OC/hr	Group Limit (R007, P057, R031, P058) = 6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? No PSD? No OFFSET POLICY? No

No

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

**Enter Determination** Use of dry filtration system and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line -

CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069

SCC CODE 4-02-006-01

EMISSIONS UNIT ID R009

EMISSIONS UNIT DESCRIPTION Primer Spray Booth - Cascade Line 2 Spray Booth 1.

DATE INSTALLED 11/88

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	0.003 lb PE/hr	0.003 ton PE/yr	0.10 lb PE/hr	0.4 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	3.14 lbs OC/hr	3.16 tons OC/yr	3.43 lbs OC/hr	Group Limit (R009, P055, R030, P056) = 6.5 tons OC/yr
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?

Enter Determination Use of dry filtration and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13436 Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Cured Rubber Seals Coating Line - CITY/TWP Bowling Green

Emissions Unit ID: R031

SIC CODE 3069 SCC CODE 4-02-002-01 EMISSIONS UNIT ID R030

EMISSIONS UNIT DESCRIPTION Topcoat Spray Booth - Cascade Line 2 Spray Booth 2.

DATE INSTALLED 5/01

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	0.04 lb PE/hr	0.03 ton PE/yr	0.10 lb PE/hr	0.4 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	2.42 lbs OC/hr	2.23 tons OC/yr	2.42 lbs OC/hr	Group Limit (R009, P055, R030, P056) = 6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Enter Determination Use of dry filtration system and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

88 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: R031

FACILITY DESCRIPTION Cured Rubber Seals Coating Line - Cascade Lines 2 and 3.

CITY/TWP Bowling Green

SIC CODE 3069 SCC CODE 4-02-002-01 EMISSIONS UNIT ID R031

EMISSIONS UNIT DESCRIPTION Topcoat Spray Booth - Cascade Line 3 Spray Booth 2.

DATE INSTALLED 5/01

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	0.04 lb PE/hr	0.03 ton PE/yr	0.10 lb PE/hr	0.4 ton PE/yr
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	2.42 lbs OC/hr	2.23 tons OC/yr	2.42 lbs OC/hr	Group Limit (R007, P057, R031, P058) = 6.5 tons OC/yr
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

**Enter Determination** Use of dry filtration system and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

**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\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: