State of Ohio Environmental Protection Agency

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

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-13884

DATE: 2/6/2003

Ishikawa Gasket America
Philip Shasteen
828 Van Camp Road
Bowling Green, OH 43402

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

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

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

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

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

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

OhioEPA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 2/6/2003**
Terms and Conditions	**Effective Date: 2/6/2003**

FINAL PERMIT TO INSTALL 03-13884

Application Number:	03-13884
APS Premise Number:	0387020350
Permit Fee:	**$2000**
Name of Facility:	Ishikawa Gasket America
Person to Contact:	Philip Shasteen
Address:	828 Van Camp Road Bowling Green, OH 43402

Location of proposed air contaminant source(s) [emissions unit(s)]:
828 Van Camp Road
Bowling Green, **Ohio**

Description of proposed emissions unit(s):
6 gasket coating lines.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
Volatile Organic Compounds (VOC)	44.4

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-1).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or

less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. the VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. The total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

2. The permit to install for this emissions unit was evaluated based on the actual materials (typically

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
Maximum Hourly Emission Rate (lbs/hr): 0.0992
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 46.71
MAGLC (ug/m^3): 5667

Pollutant: ethyl alcohol (primer)
TLV (mg/m^3): 1880
Maximum Hourly Emission Rate (lbs/hr): 0.0232
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.92
MAGLC (ug/m^3): 44762

Pollutant: n-butyl acetate (primer + thinner)
TLV (mg/m^3): 710
Maximum Hourly Emission Rate (lbs/hr): 0.02408
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 11.34
MAGLC (ug/m^3): 16905

Pollutant: isoamyl acetate (topcoat + thinner)

TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 516.8
MAGLC (ug/m^3): 12667

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is

maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	
K002 - Miscellaneous metal coating	operation consisting of 4 coating lines and 4 bake ovens: modification to

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
increase the allowable emission rate (H-2).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the

materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. The VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. The total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
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Pollutant: n-butyl acetate (primer + thinner)
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Pollutant: isoamyl acetate (topcoat + thinner)
TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
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MAGLC (ug/m^3): 12667

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will

still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the

permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-3).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. The VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. The total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
Maximum Hourly Emission Rate (lbs/hr): 0.0992
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 46.71
MAGLC (ug/m^3): 5667

Pollutant: ethyl alcohol (primer)
TLV (mg/m^3): 1880
Maximum Hourly Emission Rate (lbs/hr): 0.0232
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.92
MAGLC (ug/m^3): 44762

Pollutant: n-butyl acetate (primer + thinner)
TLV (mg/m^3): 710
Maximum Hourly Emission Rate (lbs/hr): 0.02408
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 11.34
MAGLC (ug/m^3): 16905

Pollutant: isoamyl acetate (topcoat + thinner)
TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 516.8
MAGLC (ug/m^3): 12667

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K004 - Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-4).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. the VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. The total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
Maximum Hourly Emission Rate (lbs/hr): 0.0992
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 46.71
MAGLC (ug/m^3): 5667

Pollutant: ethyl alcohol (primer)
TLV (mg/m^3): 1880
Maximum Hourly Emission Rate (lbs/hr): 0.0232
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.92
MAGLC (ug/m^3): 44762

Pollutant: n-butyl acetate (primer + thinner)
TLV (mg/m^3): 710
Maximum Hourly Emission Rate (lbs/hr): 0.02408
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 11.34
MAGLC (ug/m^3): 16905

Pollutant: isoamyl acetate (topcoat + thinner)
TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 516.8
MAGLC (ug/m^3): 12667

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K005 - Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-5).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. The VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. the total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
Maximum Hourly Emission Rate (lbs/hr): 0.0992
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 46.71
MAGLC (ug/m^3): 5667

Pollutant: ethyl alcohol (primer)
TLV (mg/m^3): 1880
Maximum Hourly Emission Rate (lbs/hr): 0.0232
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.92
MAGLC (ug/m^3): 44762

Pollutant: n-butyl acetate (primer + thinner)
TLV (mg/m^3): 710
Maximum Hourly Emission Rate (lbs/hr): 0.02408
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 11.34
MAGLC (ug/m^3): 16905

Pollutant: isoamyl acetate (topcoat + thinner)
TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 516.8
MAGLC (ug/m^3): 12667

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

Emissions Unit ID: **K006**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K006 - Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-6).	OAC rule 3745-31-05(A)(3)	1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage (see A.I.2.a). 108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage. 44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined.
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.b
	OAC rule 3745-21-09(B)(3)(d)-(e)	See A.I.2.c

2. Additional Terms and Conditions

2.a The 1.54 pounds VOC/hour and 6.75 tons VOC/year emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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

2.c The record keeping and reporting requirements specified by this rule are equivalent to or less stringent than the record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3). The record keeping requirements in section C.4 demonstrate the exemption in OAC rule 3745-21-09(U)(2)(e)(iii) cannot be violated on any one day.

B. Operational Restrictions

1. The permittee shall comply with the following maximum VOC content restrictions for the materials employed in this emissions unit:

a. Coating: 5.94 pounds VOC/gallon of coating, as applied (e.g., after thinning); and,

b. Cleanup: 7.27 pounds VOC/gallon of cleanup material.

2. Coating usage in this emissions unit shall not exceed 10 gallons of coating material, as applied, in any day.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, K004, K005 and K006, combined:

a. The name and identification number of each coating and thinner/cleanup material employed;

b. The quantity of each coating and thinner/cleanup material employed, in gallons;

c. The VOC content of each coating and thinner/cleanup material employed, in pounds/gallon;

d. The VOC emission rate from each coating and thinner/cleanup material employed, in pounds/month (sum of C.1.b x C.1.c for each material);

e. The total VOC emission rate from all coating and thinner/cleanup materials employed, in pounds/month (the sum of C.1.d); and,

f. The VOC emission rate from emissions units K001, K002, K003, K004, K005 and K006, combined (the sum of C.1.e for each month).

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

Pollutant: methyl ethyl ketone (primer)
TLV (mg/m^3): 590
Maximum Hourly Emission Rate (lbs/hr): 0.112
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 52.74
MAGLC (ug/m^3): 14048

Pollutant: methyl isobutyl ketone (primer + thinner)
TLV (mg/m^3): 205
Maximum Hourly Emission Rate (lbs/hr): 0.1352
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 63.66
MAGLC (ug/m^3): 4881

Pollutant: diacetone alcohol (primer + thinner)
TLV (mg/m^3): 238
Maximum Hourly Emission Rate (lbs/hr): 0.0992
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 46.71
MAGLC (ug/m^3): 5667

Pollutant: ethyl alcohol (primer)
TLV (mg/m^3): 1880
Maximum Hourly Emission Rate (lbs/hr): 0.0232
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.92
MAGLC (ug/m^3): 44762

Pollutant: n-butyl acetate (primer + thinner)
TLV (mg/m^3): 710
Maximum Hourly Emission Rate (lbs/hr): 0.02408
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 11.34
MAGLC (ug/m^3): 16905

Pollutant: isoamyl acetate (topcoat + thinner)
TLV (mg/m^3): 532
Maximum Hourly Emission Rate (lbs/hr): 1.0976
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 516.8
MAGLC (ug/m^3): 12667

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

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

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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

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

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

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and,

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall maintain documentation demonstrating that the emissions unit's potential daily usage based on maximum physical capacity is less than 10 gallons per day.

D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual emission limitation of 44.4 tons VOC from emissions units K001, K002, K003, K004, K005 and K006, combined. These reports are due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the emissions unit's potential daily usage based on maximum physical capacity exceeds 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

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

a. Emission Limitation:

1.54 pounds volatile organic compounds (VOC)/hour, 6.75 tons VOC/year, from coating material usage in this emissions unit

Applicable Compliance Method:

The 1.54 pounds VOC/hour emission limitation represents the potential to emit for this unit, calculated as follows: (1) multiply the maximum hourly primer usage rate (0.070 gallon/hour) by the VOC content of the primer (4.72 pounds VOC/gallon); (2) multiply the maximum hourly topcoat usage rate (0.18 gallon/hour) by the VOC content of the topcoat (5.88 pounds VOC/gallon); and (3) adding (1) and (2) together.

The annual VOC emission limitation of 6.75 tons was developed by multiplying the hourly VOC emission rate by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

b. Emission Limitation:

108.8 pounds VOC/month, 0.7 ton VOC/year, from cleanup material usage in this emissions unit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

The annual VOC emission limitation was developed by multiplying the monthly VOC emission limitation by the maximum operating schedule of 12 months/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured.

c. Emission Limitation:

44.4 tons VOC/year from units K001, K002, K003, K004, K005 and K006 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly VOC emission limitation through the record keeping required in Section B.1 of the terms and conditions of this permit.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

SIC CODE 3053 SCC CODE 4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-1).

DATE INSTALLED 05/1996

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate

NEW SC
PTI Num
FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

SIC CODE 3053 SCC CODE 4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens: modification to increase the allowable emission rate (H-2).

DATE INSTALLED 05/1996

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
compliance with the terms and conditions of this permit.

NEW SC

PTI Num

FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines CITY/TWP Bowling Green

Emissions Unit ID: **K006**

SIC CODE	SCC CODE	EMISSIONS UNIT ID
3053	4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application	K003

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens (H-3).

DATE INSTALLED 07/1998

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

7391.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines CITY/TWP Bowling Green

Emissions Unit ID: **K006**

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate

7391.wpd

NEW SC
PTI Num
FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

SIC CODE 3053 SCC CODE 4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens (H-4).

DATE INSTALLED 07/1998

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
compliance with the terms and conditions of this permit.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines CITY/TWP Bowling Green

Emissions Unit ID: **K006**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate

7391.wpd

NEW SC
PTI Num
FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

SIC CODE 3053 SCC CODE 4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens (H-5).

DATE INSTALLED 07/1998

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
compliance with the terms and conditions of this permit.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13884 Facility ID: 0387020350

FACILITY NAME Ishikawa Gasket America

FACILITY DESCRIPTION 6 gasket coating lines CITY/TWP Bowling Green

Emissions Unit ID: **K006**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate

7391.wpd

NEW SC
PTI Num
FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

SIC CODE 3053 SCC CODE 4-02-006-10 primer application; 4-02-009-98 thinning; 4-02-008-10 oven; 4-02-001-10 topcoat application EMISSIONS UNIT ID K006

EMISSIONS UNIT DESCRIPTION Miscellaneous metal coating operation consisting of 4 coating lines and 4 bake ovens (H-6).

DATE INSTALLED 07/1998

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_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65	1.54 lbs VOC/hr from coatings 108.8 lbs VOC/month from cleanup	6.75 0.65 44.4 tons VOC/year from K001-K006, combined
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

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

55 **NEW SC**

PTI Num

FACILIT

Emissions Unit ID: **K006**

FACILITY DESCRIPTION 6 gasket coating lines. CITY/TWP Bowling Green

compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $n/a

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: MEK, MIK, diacetone alcohol, ethyl alcohol, n-butyl acetate, isoamyl acetate