



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WYANDOT COUNTY**

CERTIFIED MAIL

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: 03-13660

DATE: 12/6/2001

Guardian Automotive Products
Steve McClure
12688 SH 67
Upper Sandusky, OH 43351

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,

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

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 12/6/2001
Effective Date: 12/6/2001**

FINAL PERMIT TO INSTALL 03-13660

Application Number: 03-13660
APS Premise Number: 0388010022
Permit Fee: **\$700**
Name of Facility: Guardian Automotive Products
Person to Contact: Steve McClure
Address: 12688 SH 67
Upper Sandusky, OH 43351

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12688 SH 67 South
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):
Installation of silkscreen paint line PL-1 for windshields; modification of silkscreen paint line PL-2 for windshields; installation of silkscreen cleaning station and East NC cutting line.

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 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	62.65
PE	11.31

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
PL-1 line: silkscreen machine, drying oven, conveyor, and spray operation of an alcohol, water, and diatomaceous earth slurry (modification to properly permit emission unit that was previously on registration status).	OAC rule 3745-31-05(A)(3)	<u>Silkscreen coating operation</u> 1.46 lbs organic compounds (OC)/hr, 6.39 tons OC/year
		<u>Water/alcohol/earth coating operation</u> 2.21 lbs OC/hr, 9.68 tons OC/year
		Use of baghouse (see A.2.b)
		0.86 lb particulate emissions (PE)/hr, 3.77 tons PE/year
		0% opacity as a six-minute average
	OAC rule 3745-21-07(G)(2)	None (see A.II.1)
	OAC rule 3745-17-11(B)	See A.I.2.a
	OAC rule 3745-17-07(A)	See A.I.2.a

2. Additional Terms and Conditions

- 2.a 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.b "Best Available Technology" (BAT) for this emissions unit has been determined to be the use of a baghouse for water/alcohol/earth coating operations with a maximum outlet concentration of 0.02 gr/dscf.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. 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. The permittee shall collect and record the following each month for the silkscreen coating and water/alcohol/earth coating operations:
 - a. the company name and identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating material, in lbs/gallon, as applied;
 - d. the total OC emission rate for all silkscreen coatings, in lbs/month (sum of b x c for each coating applied);
 - e. the total OC emission rate for all water/alcohol/earth coatings, in lbs/month (sum of b x c for each coating applied);
 - f. the annual year to date OC emissions from all silkscreen coatings employed (sum of d for each calendar month to date from January to December); and
 - g. the annual year to date OC emissions from all water/alcohol/earth coatings employed (sum of e for each calendar month to date from January to December).
3. The permit to install for emission units R001, R003 and R016 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied

for each pollutant emitted by these emission units 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: isopropyl alcohol
TLV (mg/m³): 983
Maximum Hourly Emission Rate (lbs/hr): 9.47
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 3631
MAGLC (ug/m³): 23,400

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective action taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in Section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that calendar year. The reports be submitted annually, by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b)

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Emissions Unit ID: **R001**

describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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. Emissions Limitation
1.46 lb OC/hr and 6.39 tons OC/yr from silkscreen coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The ton per year limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lb/ton. The permittee shall demonstrate compliance with the annual limitation by the monitoring and recordkeeping in Section C.2.

*The potential to emit for the silkscreen coating is based on a maximum OC content of 3.64 lbs OC per gallon and a maximum hourly usage rate of 0.40 gallons per hour.

- b. Emissions Limitation
2.21 lb OC/hr and 9.68 tons OC/yr from water/alcohol/earth coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The ton per year limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lb/ton. The permittee shall demonstrate compliance with the annual limitation by the monitoring and recordkeeping in Section C.2.

*The potential to emit for the water/alcohol/earth coating is based on a maximum OC content of 1.30 lbs OC per gallon and a maximum hourly usage rate of 1.70 gallons per hour.

- c. Emissions Limitation
0.86 lb PE/hr and 3.77 tons PE/yr

Applicable Compliance Method:

The emission limitation was developed by using a baghouse maximum outlet grain loading concentration of 0.02 gr/dscf (derived by the company through physical measurement) and a maximum volumetric air flow rate of 5000 dscf/min. If required, the permittee shall demonstrate compliance by testing in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000

lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emissions Limitation
0% opacity as a six-minute average

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Emissions Unit ID: **R001**

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A- Method 9.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
PL-2 line: silkscreen machine, drying oven, conveyor, and spray operation of an alcohol, water and diatomaceous earth slurry (previously permitted under PTI 03-8994 issued June 28, 1995. Modification to change from photochemically reactive materials to non-photochemically reactive materials and to properly permit the emissions unit as a line rather than coating operation and drying oven.)	OAC rule 3745-31-05(A)(3)	<u>Silkscreen coating operation</u> 1.71 lbs organic compounds (OC)/hr, 7.49 tons OC/year
		<u>Water/alcohol/earth coating operation</u> 2.86 lbs OC/hr, 12.53 tons OC/year
		Use of baghouse (see A.2.b)
		0.86 lb particulate emissions (PE)/hr, 3.77 tons PE/year
		0% opacity as a six minute average
	OAC rule 3745-21-07(G)(2)	None (see A.II.1)
	OAC rule 3745-17-11(B)	See A.I.2.a
	OAC rule 3745-17-07(A)	See A.I.2.a

2. Additional Terms and Conditions

- 2.a 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.b "Best Available Technology" (BAT) for this emissions unit has been determined to be the

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Emissions Unit ID: **R003**

use of a baghouse for water/alcohol/earth coating operations with a maximum outlet concentration of 0.02 gr/dscf.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. 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. The permittee shall collect and record the following each month for the silkscreen coating and water/alcohol/earth coating operations:
 - a. the company name and identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating material, in lbs/gallon, as applied;
 - d. the total OC emission rate for all silkscreen coatings, in lbs/month (sum of b x c for each coating applied);
 - e. the total OC emission rate for all water/alcohol/earth coatings, in lbs/month (sum of b x c for each coating applied);
 - f. the annual year to date OC emissions from all silkscreen coatings employed (sum of d for each calendar month to date from January to December); and
 - g. the annual year to date OC emissions from all water/alcohol/earth coatings employed (sum of e for each calendar month to date from January to December).
3. The permit to install for emission units R001, R003 and R016 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied

for each pollutant emitted by these emission units 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: isopropyl alcohol
TLV (mg/m³): 983
Maximum Hourly Emission Rate (lbs/hr): 9.47
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 3631
MAGLC (ug/m³): 23,400

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective action taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in Section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that calendar year. The reports be submitted annually, by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any

visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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. Emissions Limitation
1.71 lb OC/hr and 7.49 tons OC/yr from silkscreen coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The ton per year limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lb/ton. The permittee shall demonstrate compliance with the annual limitation by the monitoring and recordkeeping in Section C.2.

*The potential to emit for the silkscreen coating is based on a maximum OC content of 3.64 lbs OC per gallon and a maximum hourly usage rate of 0.47 gallons per hour.

- b. Emissions Limitation
2.86 lb OC/hr and 12.53 tons OC/yr from water/alcohol/earth coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The ton per year limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lb/ton. The permittee shall demonstrate compliance with the annual limitation by the monitoring and recordkeeping in Section C.2.

*The potential to emit for the water/alcohol/earth coating is based on a maximum OC content of 1.30 lbs OC per gallon and a maximum hourly usage rate of 2.00 gallons per hour.

- c. Emissions Limitation
0.86 lb PE/hr and 3.77 tons PE/yr

Applicable Compliance Method:

The emission limitation was developed by using a baghouse maximum outlet grain loading concentration of 0.02 gr/dscf (derived by the company through physical measurement) and a maximum volumetric air flow rate of 5000 dscf/min. If required, the permittee shall demonstrate compliance by testing in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000

Guardian Automotive Products

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Issued

Facility ID: 0388010022

Emissions Unit ID: **R003**

lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emissions Limitation
0% opacity as a six-minute average

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Guard

PTI A

Issued: 12/6/2001

Emissions Unit ID: **R003**

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A- Method 9.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
East NC cutting line: spray application of isopropyl alcohol, water and diatomaceous earth slurry (modification of a previously unpermitted emission unit to allow for the use of isopropyl alcohol).	OAC rule 3745-31-05(A)(3)	<u>Water/alcohol/earth coating operations</u> 4.41 lbs OC/hr, 19.31 tons OC/year Use of baghouse (see A.2.b.) 0.86 lb particulate emissions (PE)/hr, 3.77 tons PE/year 0% opacity as a six-minute average
	OAC rule 3745-21-07(G)(2)	None (see A.II.1.)
	OAC rule 3745-17-11(B)	See A.I.2.a
	OAC rule 3745-17-07(A)	See A.I.2.a

2. Additional Terms and Conditions

- 2.a 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.b "Best Available Technology" (BAT) for this emissions unit has been determined to be the use of a baghouse for water/alcohol/earth coating operations with a maximum outlet concentration of 0.02 gr/dscf.

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PTI A

Issued: 12/6/2001

Emissions Unit ID: **R016**

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. 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. The permittee shall collect and record the following each month for water/alcohol/earth coating operations:
 - a. the company name and identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating material, in lbs/gallon, as applied;
 - d. the total OC emission rate for all water/alcohol/earth coatings, in lbs/month (sum of b x c for each coating applied);
 - e. the annual year to date OC emissions from all water/alcohol/earth coatings employed (sum of d for each calendar month to date from January to December).
3. The permit to install for emission units R001, R003 and R016 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units 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: isopropyl alcohol
TLV (mg/m³): 983
Maximum Hourly Emission Rate (lbs/hr): 9.47
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 3631

MAGLC (ug/m3): 23,400

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation 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.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this

Emissions Unit ID: **R016**

emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective action taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in Section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that calendar year. The reports be submitted annually, by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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. Emissions Limitation
4.41 lb OC/hr and 19.31 tons OC/yr from water/alcohol/earth coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*.

Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The ton per year limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lb/ton. The permittee shall demonstrate compliance with the annual limitation by the monitoring and recordkeeping in Section C.2.

*The potential to emit for the water/alcohol/earth coating is based on a maximum OC content of 1.30 lbs OC per gallon and a maximum hourly usage rate of 3.39 gallons per hour.

- b. Emissions Limitation
0.86 lb PE/hr and 3.77 tons PE/yr

Applicable Compliance Method:

The emission limitation was developed by using a baghouse maximum outlet grain loading concentration of 0.02 gr/dscf (derived by the company through physical measurement) and a maximum volumetric air flow rate of 5000 dscf/min. If required, the permittee shall demonstrate compliance by testing in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emissions Limitation
0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A- Method 9.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Silkscreen cleaning station (modification to permit this emission unit separately from R001)	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day
	OAC rule 3745-31-05(A)(3)	7.30 tons OC/year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. **Additional Terms and Conditions**

- 2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the operation:
 - a. the company identification for each photochemically reactive material employed;
 - b. the number of gallons of each photochemically reactive material employed;

- c. the organic compound content of each photochemically reactive material, in pounds per gallon;
- d. the total organic compound emission rate for all photochemically reactive materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all photochemically reactive materials, i.e., (d / e), in pounds per hour (average); and
- g. the annual, year to date organic compound emissions from all photochemically reactive materials employed [sum of (d) from January to December].

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

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic emissions for each such day.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in Section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that calendar year. The reports be submitted annually, by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
8 pounds/hour of OC emissions

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the recordkeeping requirements contained in section C.1. of this permit.
 - b. Emission Limitation
40 pounds/day of OC emissions

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the recordkeeping requirements contained in section C.1. of this permit.
 - c. Emission Limitation
7.30 tons/year of OC emissions

Applicable Compliance Method
Compliance with annual organic compound emission limit shall be based upon the recordkeeping requirements contained in section C.1. of this permit.

F. Miscellaneous Requirements

None