



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17207

Fac ID: 0388010047

DATE: 2/5/2008

Bridgestone APM-RTM Plant
David Osmun
235 Commerce Way
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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 2/5/2008
Effective Date: 2/5/2008**

FINAL PERMIT TO INSTALL 03-17207

Application Number: 03-17207
Facility ID: 0388010047
Permit Fee: **\$1500**
Name of Facility: Bridgestone APM-RTM Plant
Person to Contact: David Osmun
Address: 235 Commerce Way
Upper Sandusky, OH 43351

Location of proposed air contaminant source(s) [emissions unit(s)]:
**235 Commerce Way
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):
Administrative modification to combine primer and topcoat emission limitations for all coating operations.

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

Chris Korleski
Director

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

8

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

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.

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

of any transfer of this permit.

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

4. Authorization To Install or Modify

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

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

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

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

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

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	39.86
PE	7.71

Bridgestone APM-RTM Plant
PTI Application: 03-17207
Issued: 2/5/2008

Facility ID: 0388010047

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: K004 through K013. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: R001 through R004. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.

This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set fourth in Subpart MMMM since the coating of miscellaneous metal parts is the predominant activity at the facility. Therefore, emissions units R001 through R004 will comply with 40 CFR Part 63, Subpart MMMM.

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K004) - Index coating line no. 1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.98 lb organic compounds (OC)/hr; 4.29 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M MMMM	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been

Emissions Unit ID: K004

discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:
- 63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and

Emissions Unit ID: K004

operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

Emissions Unit ID: K004

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance {[summation of (b x c) for all coatings] x (1 - over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance))}; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and

Issued: 2/5/2008

- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- 2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
- 5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- 6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

V. Testing Requirements

- 1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967
- 2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions

Emissions Unit ID: K004

shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.98 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.0 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
4.29 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 4.29 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

Issued: 2/5/2008

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K004) - Index coating line no. 1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K004

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K005) - Index coating line no.2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.98 lb organic compounds (OC)/hr; 4.29 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

Emissions Unit ID: K005

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K005

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K005

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.98 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.0 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
4.29 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 4.29 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K005) - Index coating line no.2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Emissions Unit ID: K005

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(K006) - Robot coating operation vented to a thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.72 lb organic compounds (OC)/hr; 3.15 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

Emissions Unit ID: K006

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K006

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K006

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.72 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.2 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
3.15 tons OC/year from and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 3.15 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K006) - Robot coating operation vented to a thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K006

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K007) - Chain on edge coating line no.1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 1.14 lb organic compounds (OC)/hr; 4.99 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

Emissions Unit ID: K007

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K007

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K007

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
1.14 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.5 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
4.99 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 4.99 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K007) - Chain on edge coating line no.1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.a

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K007

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(K008) - Chain on edge coating line no. 2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 1.14 lb organic compounds (OC)/hr; 4.99 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart Mmmm	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

Emissions Unit ID: K008

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K008

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K008

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
1.14 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.5 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
4.99 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 4.99 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K008) - Chain on edge coating line no. 2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-13512, issued 4/24/01 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Emissions Unit ID: K008

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K009) - Robot coating line no.2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-16278, issued 2/10/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.82 lb organic compounds (OC)/hr; 3.59 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

Emissions Unit ID: K009

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

63.3892(a) through (c) and 63.3893(a) through (c)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

Emissions Unit ID: K009

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

V. Testing Requirements

Emissions Unit ID: K009

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.82 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.5 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

Issued: 2/5/2008

- b. Emission Limitation:
3.59 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 3.59 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

Emissions Unit ID: K009

Issued: 2/5/2008

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K009) - Robot coating line no.2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-16278, issued 2/10/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Emissions Unit ID: K009

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K010) - Roll coat line no.1 vented to regenerative thermal oxidizer (administrative modification to PTI 03-16278, issued 2/10/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.43 lb organic compounds (OC)/hr; 1.88 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart Mmmm	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

Emissions Unit ID: K010

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K010

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K010

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.43 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.3 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
1.88 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 1.88 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K010) - Roll coat line no.1 vented to regenerative thermal oxidizer (administrative modification to PTI 03-16278, issued 2/10/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K010

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K011) - Flange index bond line no.1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17097, issued 5/25/06 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.49 lb organic compounds (OC)/hr; 2.15 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-09 (B)(6)	See A.I.2.c
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
40 CFR Part 63 Subpart M	See 63.3890 0.31 kg (2.6 lb) organic hazardous air pollutant (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.d) See Section A.1 of Part II - Facility Specific Terms and Conditions

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal

Issued: 2/5/2008

oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3900 and 63.3901
- 2.e** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

Emissions Unit ID: K011

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained

Issued: 2/5/2008

during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information

Emissions Unit ID: K011

concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.a and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K011

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.49 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.5 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
2.15 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 2.15 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

Issued: 2/5/2008

E = PE rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K011) - Flange index bond line no.1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17097, issued 5/25/06 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K011

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(K012) - tumble and spray bond line vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17252, issued 5/15/07 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See A.I.2.a and A.I.2.b 0.92 lb organic compounds (OC)/hr; 4.03 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.c)
OAC rule 3745-21-09(B)(6)	See A.I.2.d
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.e
40 CFR Part 63, Subpart M	63.3890 0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS See A.I.2.f

Issued: 2/5/2008

Emissions Unit ID: K012

Issued: 2/5/2008

2. Additional Terms and Conditions

2.a Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for this emissions unit is 4.03 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 2.8 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

2.b Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. 100% of all cleanup material used to be reclaimed resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

2.c A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.

2.d In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(C).

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from

Emissions Unit ID: K012

each coating booth operation under OAC rule 3745-17-11(B).

- 2.f** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.4500 and 63.4501

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

Issued: 2/5/2008

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of } (b \times c) \text{ for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and

Emissions Unit ID: K012

- e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.b and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:
63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

Issued: 2/5/2008

4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.b and/or reclaimed as specified in A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Emissions Unit ID: K012

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.92 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.8 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
4.03 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 4.03 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

Issued: 2/5/2008

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K012) - tumble and spray bond line vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17252, issued 5/15/07 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K012

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(K013) - Flange index bond line no. 2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17262, issued 6/5/07 to establish a grouped OC emission limitation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See A.I.2.a and A.I.2.b 0.49 lb organic compounds (OC)/hr; 2.15 tons OC/year 39.86 tons OC year from emissions units K004-K013 and R001-R004 combined (See A.I.2.c)
OAC rule 3745-21-09(B)(6)	See A.I.2.d
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.e
40 CFR Part 63, Subpart M	63.3890 0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS See A.I.2.f

Issued: 2/5/2008

Emissions Unit ID: K013

Issued: 2/5/2008

2. Additional Terms and Conditions

2.a Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for this emissions unit is 2.15 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 1.5 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

2.b Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. 100% of all cleanup material used to be reclaimed resulting in no emissions from cleanup operations (see A.II.2). Cleanup solvents are only used in the enclosed booth when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

2.c A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.

2.d In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(C).

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from

Emissions Unit ID: K013

each coating booth operation under OAC rule 3745-17-11(B).

- 2.f** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.4500 and 63.4501

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall recover 100% of all cleanup material employed in this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

Issued: 2/5/2008

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading

Emissions Unit ID: K013

immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance {[summation of (b x c) for all coatings] x (1 - over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance))}; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date from January to December).
3. The permittee shall maintain records that document any cleanup operations which were not performed as described in A.I.2.b and/or reclaimed as specified in A.II.2 above.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a) through (k)

Bridgestone APM-RTM Plant
DTI Application: 02 17207

Facility ID: 0388010047

Emissions Unit ID: K013

Issued: 2/5/2008

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) of any record showing that cleanup operations which were not performed as described in A.I.2.b and/or reclaimed as specified in A.II.2 above. The notification

Emissions Unit ID: K013

shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.49 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.5 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
2.15 tons OC/year and 39.86 tons OC/year from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 2.15 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

Issued: 2/5/2008

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K013) - Flange index bond line no. 2 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17262, issued 6/5/07 to establish a grouped OC emission limitation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: K013

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R001) - Honda bondline no.1 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-16249, issued 2/22/05 to establish a grouped OC emissions limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.33 lb organic compounds (OC)/hr; 1.45 tons OC/year from coating and cleanup operations 39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-07(G)(2)	See A.I.2.c
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OACr rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
40 CFR Part 63, Subpart PPPP	63.4481(e) See A.I.2.d See section A.2. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

<p>40 CFR Part 63, Subpart M Mmmm</p>	<p>63.3890</p> <p>0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period</p> <p>See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS</p> <p>See A.I.2.e</p>
--	---

2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).
- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart Mmmm). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set fourth in Subpart Mmmm since the coating of miscellaneous metal parts is the predominant activity at the facility.
- 2.e** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3900 and 63.3901
- 2.f** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

Emissions Unit ID: R001

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the

Issued: 2/5/2008

personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of (b x c) for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date 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:

Emissions Unit ID: R001

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).

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

Emissions Unit ID: R001

4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M MMM, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M MMM, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967
2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

Issued: 2/5/2008

- a. Emission Limitation:
0.33 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
1.45 tons OC/year from coating and cleanup operations and 39.86 tons OC/year from coating and cleanup operations from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 1.45 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

Issued: 2/5/2008

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

Issued: 2/5/2008

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R001) - Honda bondline no.1 vented to a regenerative thermal oxidizer(administrative modification to PTI 03-16249, issued 2/22/05 to establish a grouped OC emissions limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Bridgestone APM-RTM Plant

DTL Application: 02-17207

Facility ID:**0388010047**

Emissions Unit ID: R001

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R002) - Honda bondline no.2 vented to a regenerative thermal oxidizer(administrative modification to PTI 03-16249, issued 2/22/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See A.I.2.a 0.33 lb organic compounds (OC)/hr; 1.45 tons OC/year from coating and cleanup operations 39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-07(G)(2)	See A.I.2.c
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OACr rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
40 CFR Part 63, Subpart PPPP	63.4481(e) See A.I.2.d See section A.2. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

Emissions Unit ID: R002

40 CFR Part 63, Subpart M MMMM	63.3890 0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS See A.I.2.e
-----------------------------------	--

2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).
- 2.b** A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- 2.c** The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set fourth in Subpart MMMM since the coating of miscellaneous metal parts is the predominant activity at the facility.
- 2.e** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3900 and 63.3901
- 2.f** The lb/hr and ton/year OC emissions limitations represent the emissions units potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).

II. Operational Restrictions

Emissions Unit ID: R002

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the

Issued: 2/5/2008

personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of (b x c) for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date 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:

Emissions Unit ID: R002

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).

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

Emissions Unit ID: R002

4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M MMM, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M MMM, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

Issued: 2/5/2008

- a. Emission Limitation:
0.33 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
1.45 tons OC/year from coating and cleanup operations and 39.86 tons OC/year from coating and cleanup operations from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 1.45 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

Issued: 2/5/2008

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

Issued: 2/5/2008

- d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R002) - Honda bondline no.2 vented to a regenerative thermal oxidizer(administrative modification to PTI 03-16249, issued 2/22/05 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

Emissions Unit ID: R002

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(R003) - Honda bondline no.3 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17262, issued 6/5/07 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See A.I.2.a 0.33 lb organic compounds (OC)/hr; 1.45 tons OC/year from coating and cleanup operations 39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-07(G)(2)	See A.I.2.c
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OACr rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.d
40 CFR Part 63, Subpart PPPP	63.4481(e) See A.I.2.e See section A.2. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

40 CFR Part 63, Subpart M MMMM	63.3890 0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS See A.1.2.f
-----------------------------------	--

2. Additional Terms and Conditions

2.a Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for this emissions unit is 1.45 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 0.9 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

2.b A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.

2.c The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(C).

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).

2.e This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set fourth in Subpart MMMM since the coating of miscellaneous metal parts is the predominant activity at the facility.

Issued: 2/5/2008

2.f The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900 and 63.3901

Issued: 2/5/2008

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines

Emissions Unit ID: R003

that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of (b x c) for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date 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:

Issued: 2/5/2008

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).

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The summary reports shall be submitted

Emissions Unit ID: R003

in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Issued: 2/5/2008

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.33 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:
1.45 tons OC/year from coating and cleanup operations and 39.86 tons OC/year from coating and cleanup operations from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation of 1.45 tons OC/year was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Issued: 2/5/2008

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

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

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Emissions Unit ID: R003

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R003) - Honda bondline no.3 vented to a regenerative thermal oxidizer (administrative modification to PTI 03-17262, issued 6/5/07 to establish a grouped OC emission limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV ($\mu\text{g}/\text{m}^3$): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3

MAGLC ($\mu\text{g}/\text{m}^3$): 4486

Issued: 2/5/2008

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R004) - Honda bondline no.4 vented to a regenerative thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See A.I.2.a 0.33 lb organic compounds (OC)/hr; 1.45 tons OC/year from coating and cleanup operations 39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R001-R004 combined (See A.I.2.b)
OAC rule 3745-21-07(G)(2)	See A.I.2.c
OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
OACr rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.d
40 CFR Part 63, Subpart PPPP	63.4481(e) See A.I.2.e See section A.2. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

40 CFR Part 63, Subpart M MMMM	63.3890 0.31 kg (2.6 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See section A.1. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS See A.I.2.f
-----------------------------------	--

2. Additional Terms and Conditions

2.a Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for this emissions unit is 1.45 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 0.9 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

2.b A grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R001-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.

2.c The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(C).

2.d The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).

2.e This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set fourth in Subpart MMMM since the coating of miscellaneous metal parts is the predominant activity at the facility.

Issued: 2/5/2008

2.f The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900 and 63.3901

Issued: 2/5/2008

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the emission unit is in operation.
2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3892(a) through (c) and 63.3893(a) through (c)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal incinerator, monitoring equipment, and the associated emissions unit.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines

Emissions Unit ID: R004

that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R001-R004 combined:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance $\{[\text{summation of (b x c) for all coatings}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)})\}$; and
 - e. the annual year-to-date organic compound emissions (sum of d for each month to date 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:

Issued: 2/5/2008

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).

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:

63.3930(a) through (k)

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the combustion temperature within the thermal oxidizer was not equal to the acceptable value;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the

Emissions Unit ID: R004

associated emissions unit was in operation. The summary reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R001-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart Mmmm, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

Issued: 2/5/2008

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960, 63.3961 and 63.3963 through 63.3967

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
0.33 lb OC/hour

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions test were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 18, 25 or 25 A.

- b. Emission Limitation:
1.45 tons OC/year from coating and cleanup operations and 39.86 tons OC/year from coating and cleanup operations from K004-K013 and R001-R004 combined

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly emission limitation 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 shall also be shown with the annual limitation.

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

- c. Emission Limitation:
0.551 pound PE per hour

Emissions Unit ID: R004

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$$E = \text{PE rate (lbs/hr)}$$
$$E = \text{maximum coating solids usage rate, in pounds per hour (1-TE) x (1-CE)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: 2/5/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(R004) - Honda bondline no.4 vented to a regenerative thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K001-K013 and R001-R004 combined was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to these emissions units for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
TLV ($\mu\text{g}/\text{m}^3$): 188.4

Issued: 2/5/2008

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 287.3

MAGLC ($\mu\text{g}/\text{m}^3$): 4486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None