

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "03-17354"

- A. This PTI is for the installation of a roll coating machine that is vented to an RTO and will process rubber bushings and will consist of a solvent cleaning process, pre-treatment primer (both applied by roll-coating) and a topcoat spray application. This emissions unit is subject to the MACT standards for Surface Coating of Plastic Parts and Product, Subpart PPPP. The compliance date for this MACT was April 19, 2007. The facility is also subject to the MACT for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM. Coating of miscellaneous metal parts is the predominant operation at the facility, therefore, the company chooses to comply with Subpart MMMM in lieu of Subpart PPPP.
- B. The RTO associated with this emission unit has a 95% control efficiency and a capture efficiency of 100%. The RTO (RTO #2) will function to serve the following emissions units: K009-K010 (PTI 03-16278), K011 (PTI 03-17097), K012 (PTI 03-17252), R001-R002 (PTI 03-16249), K013 & R003 (PTI 03-17262) and this new emissions unit. Emissions from the RTO were determined to be insignificant per the emissions analysis as part of PTI 03-16249 and 03-16278.
- C. Emissions will be based on the worst-case coating/cleanup solvent VOC content and the highest hourly usage.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 03-17354

Fac ID: 0388010047

DATE: 10/30/2007

Bridgestone APM-RTM Plant
David Osmun
235 Commerce Way
Upper Sandusky, OH 43351

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

NWDO

MI

WYANDOT COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17354 FOR AN AIR CONTAMINANT SOURCE
FOR **Bridgestone APM-RTM Plant****

On 10/30/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Bridgestone APM-RTM Plant**, located at **235 Commerce Way, Upper Sandusky, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17354:

Bondline No. 4.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-17354

Application Number: 03-17354
Facility ID: 0388010047
Permit Fee: **To be entered upon final issuance**
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):

Bondline No. 4.

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: 03-17354
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0388010047

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

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

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: 03-17354
Issued: To be entered upon final issuance

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

Bridgestone APM-RTM Plant

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Bridgestone APM-RTM Plant
PTI Application: 03-17354
Issued: To be entered upon final issuance

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

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

- 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

Bridgestone APM-RTM Plant

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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

Bridgestone APM-RTM Plant
PTI Application: 03-17354
Issued: To be entered upon final issuance

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

13

Bridgestone APM-RTM Plant

PTI Application: 03-17354

Issued: To be entered upon final issuance
of any transfer of this permit.

Facility ID: 0388010047

Bridgestone APM-RTM Plant

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

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**Facility ID: 0388010047****PTI Application: 03-17354****Issued: To be entered upon final issuance**

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	1.47
PE	0.551

Bridgestone APM-RTM Plant

Facility ID: 0388010047

PTI Application: 03-17354

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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 with regenerative thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (C)	0.33 lbs organic compounds (OC)/hour, 1.45 tons OC/year from coating operations 2.91 lbs OC/month, 0.02 tons OC/year from cleanup operations See A.I.2.a
OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(C).
OAC rule 3745-17-11(B)	0.551 lb particulate emission (PE)/hr
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule
ORC 3704.03(T)(4)	See A.I.2.b
40 CFR Part 63 Subpart M	See 63.3890 0.23 kg (1.9 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period (See A.I.2.c)

2. Additional Terms and Conditions

- 2.a The permittee has requested voluntary allowable emission limitations of 0.33 lb OC/hour and 1.45 tons OC/year from coating operations and 2.91 lbs OC/hour and 0.02 tons OC/year from cleanup operations. The short-term (pound/hour) and long-term (tons/year) emission limitations for OC are being established as practically and legally enforceable requirements representing the federally enforceable potential to emit based on the use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture).
- 2.b 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

Emissions Unit ID: R004

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.c** This facility is subject 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 Subpart PPPP and because the coating of miscellaneous metal parts is the predominant activity at the facility, the permittee has chosen to comply with the emission limits set forth in Subpart MMMM for all applicable surface coating operations.

II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM (the predominant activity at the facility), 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:
- 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
 - 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: To be entered upon final issuance

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 each coating employed in this emissions unit:
 - 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

Emissions Unit ID: R004

3. The permittee shall collect and record the following information each month for each cleanup material employed in this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content, for each cleanup material employed in pounds per gallon;
 - d. the OC emission rate for each cleanup material employed, in pounds per month (b x A.III.2.c);

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

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

- e. the total OC emission rate for all cleanup materials employed, in pounds per month (sum of d); and
 - f. the annual, year to date OC emissions, in tons, from all cleanup materials employed [(sum of e) for each month to date from January to December].
4. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M (the predominant activity at the facility), 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;

Issued: To be entered upon final issuance

- 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 coating material usage and the total annual actual OC emissions from cleanup material usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 4. 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 (the predominant activity at the facility), 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 in accordance with the following requirements:
 - a. the emission testing shall be conducted within 6 months after startup of emissions unit;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC, the capture efficiency and control device efficiency requirements, and per the requirements of 40 CFR Part 63, Subpart M MMM (the predominant activity at the facility) section 63.3960;

Emissions Unit ID: R004

- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Methods 18, 25 or 25a, as applicable, of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
- d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
- e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following

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completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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 from coating operations

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 (0.90 gallons/hr), the maximum coating OC content (7.27 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliance with the 0.33 lb OC/hr emission limitation shall be based upon the results of emission testing conducted in accordance with the test methods and procedures as outlined in section A.V.1 of this permit.

- b. Emission Limitation:
1.45 tons OC/year from coating operations

Emissions Unit ID: R004

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. Compliance with the 1.45 tons OC/yr emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

c. Emission Limitation:

2.91 lbs OC/month and 0.02 tons/year from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

d. 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).

e. 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).

f. Emission Limitation:

0.23 kg (1.9 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period

Applicable Compliance Method:

Emissions Unit ID: R004

Issued: To be entered upon final issuance

Compliance with the 0.23 kg (1.9 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period emission limitation shall be based upon the results of emission testing conducted in accordance with the test methods and procedures as outlined in section A.V.1 of this permit and 40 CFR Part 63, Subpart M section 63.3960.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None