☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **03-16366**

## A. Source Description

This PTI is for three glue booths, emissions unit R001-R003, used in the production of polyurethane foam seats located at Bridgestone APM.

## B. Facility Emissions and Attainment Status

Bridgestone APM is considered a "major" facility for Title V purposes. Wyandot County is designated as attainment for all criteria pollutants.

## C. Source Emissions

This permit will place federally enforceable restrictions on the emissions units by way of a combined annual restriction on material usage of 5882 gallons. This restriction will result in a permit allowable emissions of 16.38 tons per rolling 12-month period combined for emissions units R001-R003.

## D. Conclusion

With federally enforceable restrictions in place for OC emissions, facility-wide emissions will be less than 250 tons VOC per year making Bridgestone APM a "minor" facility for PSD purposes.

State of Ohio Environmental Protection Agency

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

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

**Application No:** 03-16366
**Fac ID:** 0388010051

**DATE:** 8/18/2005

Bridgestone APM Company
Joseph Clark
PO Box 1505 1800 Industrial Drive
Findlay, OH 45839

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of 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 **$1200** 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 **03-16366** FOR AN AIR CONTAMINANT SOURCE FOR
**Bridgestone APM Company**

On 8/18/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Bridgestone APM Company**, located at **245 Commerce Way, Upper Sandusky**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16366:

**(3) glue booths.**

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]

**DRAFT PERMIT TO INSTALL 03-16366**

| | |
|---|---|
| Application Number: | 03-16366 |
| Facility ID: | 0388010051 |
| Permit Fee: | **To be entered upon final issuance** |
| Name of Facility: | Bridgestone APM Company |
| Person to Contact: | Joseph Clark |
| Address: | PO Box 1505 1800 Industrial Drive<br>Findlay, OH 45839 |

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

Description of proposed emissions unit(s):
**(3) glue booths.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (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.8 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.

**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.

**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.

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**

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.

**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 of any transfer of this permit.

### 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**

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.

**Bridgestone APM Company** **Facility ID: 0388010051**
**PTI Application: 03-16366**
**Issued: To be entered upon final issuance**

**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

| Pollutant | Tons Per Year |
|---|---|
| OC | 16.38 |
| PE | 0.12 |

## 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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R001 - Manual glue booth no.1 | OAC rule 3745-31-05(A)(3) | Control requirements (See Section A.I.2.a)<br><br>9.80 lbs organic compounds (OC)/hour<br><br>0.01 lb particulate emissions (PE)/hour, 0.04 ton PE/year<br><br>Visible PE shall not exceed 0% opacity as a six-minute average<br><br>See A.I.2.b |
| | OAC rule 3745-31-05(C) | 16.38 tons per rolling 12-month period from emissions units R001, R002 & R003 combined (See A.I.2.c) |
| | OAC rule 3745-17-11(B) | See A.I.2.d |
| | OAC rule 3745-17-07(B) | See A.I.2.d |
| | OAC rule 3745-21-07(G)(2) | See A.I.2.e |

**2. Additional Terms and Conditions**

**2.a** Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of dry filters for PE control.

**2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

**2.c** The OC emissions from emissions units R001, R002 & R003 combined shall not exceed 16.38 tons per rolling 12-month period based on a material usage restriction (See A.II.1) and an OC content restriction (see section A.II.4).

The 16.38 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

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

**2.e** The requirements of OAC rule 3745-21-07(G)(2) are not applicable because the facility employs only non-photochemically reactive materials (see Section A.II.2).

## II. Operational Restrictions

1. The maximum annual adhesive usage from R001, R002 & R003 combined shall not exceed 5882 gallons, based on a rolling, 12-month summation of material usage. To ensure enforceablility during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum Allowable Glue Usage (gallons) |
|---|---|
| 1 | 491 |
| 1-2 | 982 |
| 1-3 | 1472 |
| 1-4 | 1962 |
| 1-5 | 2452 |
| 1-6 | 2942 |
| 1-7 | 3432 |
| 1-8 | 3922 |
| 1-9 | 4412 |

Emissions Unit ID: R001

| | |
|---|---|
| 1-10 | 4902 |
| 1-11 | 5392 |
| 1-12 | 5882 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling 12-month summation of fuel usage.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

3. The permittee shall operate the dry filters whenever this emissions unit is in operation.

4. The OC content of the adhesive employed in emissions unit R001 shall not exceed 5.57 pounds per gallon, as applied.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. the company name and identification of each adhesive applied;

   b. documentation on whether or not each adhesive is a photochemically reactive material;

   c. the number of gallons of each adhesive employed;

   d. the OC content, in pounds per gallon, for each adhesive, as applied;

   e. the OC emission rate for each adhesive employed, in lbs/month © x d for each adhesive employed); and

   f. the total monthly OC emission rate for all adhesives employed, in lbs (sum of e for all adhesives).

3. In conjunction with the recordkeeping requirements specified in A.III.2 above, the permittee shall also record the following each month for emission units R001, R002 & R003 combined:

   a. for the first 12 months of operation, the cumulative monthly emissions rate of OC, in tons per month;

b. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative adhesive usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the adhesive usage, in gallons.

## IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in A.II.1 of this permit;

   b. any exceedances of the 16.38 tons OC per rolling, 12-month period for R001, R002 & R003 combined;

   c. any exceedances of the maximum allowable adhesive OC content specified in A.II.4.

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

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

## V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions

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

a. **Emission Limitation**
9.80 lbs OC/hour

**Applicable Compliance Method**
The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 1.76 gal/hr and a maximum OC content of 5.57 lbs/gal.

b. **Emission Limitation**
16.38 tons OC per rolling 12-month period for emissions units R001, R002 & R003 combined

**Applicable Compliance Method**
Compliance with this limitation shall be demonstrated through recordkeeping requirements in section AIII.3 of this permit.

c. **Emission Limitation**
0.01 lb PE/hour

**Applicable Compliance Method**
The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

where

E = PE rate (lbs/hr)

TE = transfer efficiency (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, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

d. **Emission Limitation**
0.04 ton of PE/year

**Applicable Compliance Method**

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. **Emission Limitation**

Visible PE shall not exceed 0% opacity as a six-minute average

**Applicable Compliance Method**

If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.

## VI. Miscellaneous Requirements

None

**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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R001 - Manual glue booth no.1 | | See B.III.1 through B.III.4 below |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for emission units R001, R002 & R003 was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

   Pollutant: hexane
   TLV (mg/m3): 176.24
   Maximum Hourly Emission Rate (lbs/hr): 29.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1452
MAGLC (ug/m3): 4196

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

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

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

   a. a description of the parameters changed (composition of materials, new

pollutants emitted, change in stack/exhaust parameters, etc.)

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

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

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R002 - Manual glue booth no.2 | OAC rule 3745-31-05(A)(3) | Control requirements (See A.I.2.a)<br><br>9.80 lbs organic compounds (OC)/hour<br><br>0.01 lb particulate emissions (PE)/hour, 0.04 ton PE/year<br><br>Visible PE shall not exceed 0% opacity as a six-minute average<br><br>See A.I.2.b |
| | OAC rule 3745-31-05(C) | 16.38 tons per rolling 12-month period from emissions units R001, R002 & R003 combined (See A.I.2.c) |
| | OAC rule 3745-17-11(B) | See A.I.2.d |
| | OAC rule 3745-17-07(B) | See A.I.2.d |
| | OAC rule 3745-21-07(G)(2) | See A.I.2.e |

**2. Additional Terms and Conditions**

**2.a** Best available technology (BAT) control requirements for this emissions unit has

been determined to be the use of dry filters for PE control.

**2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

**2.c** The OC emissions from emissions units R001, R002 & R003 combined shall not exceed 16.38 tons per rolling 12-month period based on a material usage restriction (See A.II.1) and an OC content restriction (see section A.II.4).

The 16.38 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

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

**2.e** The requirements of OAC rule 3745-21-07(G)(2) are not applicable because the facility employs only non-photochemically reactive materials (see Section A.II.2).

## II. Operational Restrictions

1. The maximum annual adhesive usage from R001, R002 & R003 combined shall not exceed 5882 gallons, based on a rolling, 12-month summation of material usage. To ensure enforceablility during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum Allowable Glue Usage (gallons) |
|---|---|
| 1 | 491 |
| 1-2 | 982 |
| 1-3 | 1472 |
| 1-4 | 1962 |
| 1-5 | 2452 |
| 1-6 | 2942 |
| 1-7 | 3432 |
| 1-8 | 3922 |
| 1-9 | 4412 |
| 1-10 | 4902 |

Emissions Unit ID: R002

| | |
|---|---|
| 1-11 | 5392 |
| 1-12 | 5882 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling 12-month summation of fuel usage.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

3. The permittee shall operate the dry filters whenever this emissions unit is in operation.

4. The OC content of the adhesive employed in emissions unit R002 shall not exceed 5.57 pounds per gallon, as applied.

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

1. The permittee shall maintain daily records that document any time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. the company name and identification of each adhesive applied;

   b. documentation on whether or not each adhesive is a photochemically reactive material;

   c. the number of gallons of each adhesive employed;

   d. the OC content, in pounds per gallon, for each adhesive, as applied;

   e. the OC emission rate for each adhesive employed, in lbs/month © x d for each adhesive employed); and

   f. the total monthly OC emission rate for all adhesives employed, in lbs (sum of e for all adhesives).

3. In conjunction with the recordkeeping requirements specified in A.III.2 above, the permittee shall also record the following each month for emission units R001, R002 & R003 combined:

   a. for the first 12 months of operation, the cumulative monthly emissions rate of OC, in tons per month;

   b. beginning the first month after the 12 calendar months of operation, the rolling,

12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative adhesive usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the adhesive usage, in gallons.

## IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in A.II.1 of this permit;

   b. any exceedances of the 16.38 tons OC per rolling, 12-month period for R001, R002 & R003 combined;

   c. any exceedances of the maximum allowable adhesive OC content specified in A.II.4.

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

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

## V. Testing Requirements

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

a. **Emission Limitation**
9.80 lbs OC/hour

**Applicable Compliance Method**
The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 1.76 gal/hr and a maximum OC content of 5.57 lbs/gal.

b. **Emission Limitation**
16.38 tons OC per rolling 12-month period for emissions units R001, R002 & R003 combined

**Applicable Compliance Method**
Compliance with this limitation shall be demonstrated through recordkeeping requirements in section AIII.3 of this permit.

c. **Emission Limitation**
0.01 lb PE/hour

**Applicable Compliance Method**
The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

where

E = PE rate (lbs/hr)

TE = transfer efficiency (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, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

d. **Emission Limitation**
0.04 ton of PE/year

**Applicable Compliance Method**
The annual limitation was developed by multiplying the hourly limitation by a

maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. **Emission Limitation**
Visible PE shall not exceed 0% opacity as a six-minute average

**Applicable Compliance Method**
If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.

## VI. Miscellaneous Requirements

None

Emissions Unit ID: R002

**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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R002 - Manual glue booth no.2 | | See B.III.1 through B.III.4 below |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for emission units R001, R002 & R003 was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

   Pollutant: hexane
   TLV (mg/m3): 176.24
   Maximum Hourly Emission Rate (lbs/hr): 29.4
   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1452
MAGLC (ug/m3): 4196

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

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

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R003 - Manual glue booth no.3 | OAC rule 3745-31-05(A)(3) | Control requirements (See A.I.2.a)<br><br>9.80 lbs organic compounds (OC)/hour<br><br>0.01 lb particulate emissions (PE)/hour, 0.04 ton PE/year<br><br>Visible PE shall not exceed 0% opacity as a six-minute average<br><br>See A.I.2.b |
| | OAC rule 3745-31-05(C) | 16.38 tons per rolling 12-month period from emissions units R001, R002 & R003 combined (See A.I.2.c) |
| | OAC rule 3745-17-11(B) | See A.I.2.d |
| | OAC rule 3745-17-07(B) | See A.I.2.d |
| | OAC rule 3745-21-07(G)(2) | See A.I.2.e |

**2. Additional Terms and Conditions**

**2.a** Best available technology (BAT) control requirements for this emissions unit has

been determined to be the use of dry filters for PE control.

**2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

**2.c** The OC emissions from emissions units R001, R002 & R003 combined shall not exceed 16.38 tons per rolling 12-month period based on a material usage restriction (See A.II.1) and an OC content restriction (see section A.II.4).

The 16.38 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

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

**2.e** The requirements of OAC rule 3745-21-07(G)(2) are not applicable because the facility employs only non-photochemically reactive materials (see Section A.II.2).

## II. Operational Restrictions

1. The maximum annual adhesive usage from R001, R002 & R003 combined shall not exceed 5882 gallons, based on a rolling, 12-month summation of material usage. To ensure enforceablility during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum Allowable Glue Usage (gallons) |
|---|---|
| 1 | 491 |
| 1-2 | 982 |
| 1-3 | 1472 |
| 1-4 | 1962 |
| 1-5 | 2452 |
| 1-6 | 2942 |
| 1-7 | 3432 |
| 1-8 | 3922 |
| 1-9 | 4412 |
| 1-10 | 4902 |

Emissions Unit ID: R003

| | |
|---|---|
| 1-11 | 5392 |
| 1-12 | 5882 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling 12-month summation of fuel usage.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

3. The permittee shall operate the dry filters whenever this emissions unit is in operation.

4. The OC content of the adhesive employed in emissions unit R003 shall not exceed 5.57 pounds per gallon, as applied.

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

1. The permittee shall maintain daily records that document any time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. the company name and identification of each adhesive applied;

   b. documentation on whether or not each adhesive is a photochemically reactive material;

   c. the number of gallons of each adhesive employed;

   d. the OC content, in pounds per gallon, for each adhesive, as applied;

   e. the OC emission rate for each adhesive employed, in lbs/month © x d for each adhesive employed); and

   f. the total monthly OC emission rate for all adhesives employed, in lbs (sum of e for all adhesives).

3. In conjunction with the recordkeeping requirements specified in A.III.2 above, the permittee shall also record the following each month for emission units R001, R002 & R003 combined:

   a. for the first 12 months of operation, the cumulative monthly emissions rate of OC, in tons per month;

   b. beginning the first month after the 12 calendar months of operation, the rolling,

12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative adhesive usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the adhesive usage, in gallons.

## IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:

   a. any exceedances of the maximum allowable gallon usage rates specified in A.II.1 of this permit;

   b. any exceedances of the 16.38 tons VOC per rolling, 12-month period for R001, R002 & R003 combined;

   c. any exceedances of the maximum allowable adhesive OC content specified in A.II.4.

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

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

## V. Testing Requirements

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

a. **Emission Limitation**
9.80 lbs OC/hour

**Applicable Compliance Method**
The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 1.76 gal/hr and a maximum OC content of 5.57 lbs/gal.

b. **Emission Limitation**
16.38 tons OC per rolling 12-month period for emissions units R001, R002 & R003 combined

**Applicable Compliance Method**
Compliance with this limitation shall be demonstrated through recordkeeping requirements in section AIII.3 of this permit.

c. **Emission Limitation**
0.01 lb PE/hour

**Applicable Compliance Method**
The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

where

E = PE rate (lbs/hr)

TE = transfer efficiency (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, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

d. **Emission Limitation**
0.04 ton of PE/year

**Applicable Compliance Method**
The annual limitation was developed by multiplying the hourly limitation by a

maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. **Emission Limitation**
Visible PE shall not exceed 0% opacity as a six-minute average

**Applicable Compliance Method**
If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.

## VI. Miscellaneous Requirements

None

**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 | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R003 - Manual glue booth no.3 | | See B.III.1 through B.III..4 below |

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for emission units R001, R002 & R003 was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

   Pollutant: hexane
   TLV (mg/m3): 176.24
   Maximum Hourly Emission Rate (lbs/hr): 29.4
   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1452
MAGLC (ug/m3): 4196

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

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

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

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

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None