



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 03-13997**

**DATE: 9/4/2003**

Blackhawk Automotive Plastics, Inc.  
Sandra Harper  
500 North Warpole Street  
Upper Sandusky, OH 43351-9051

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

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

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

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 9/4/2003  
Effective Date: 9/4/2003**

**FINAL PERMIT TO INSTALL 03-13997**

Application Number: 03-13997  
APS Premise Number: 0388010116  
Permit Fee: **\$1000**  
Name of Facility: Blackhawk Automotive Plastics, Inc.  
Person to Contact: Sandra Harper  
Address: 500 North Warpole Street  
Upper Sandusky, OH 43351-9051

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**500 North Warpole Street**  
**Upper Sandusky, Ohio**

Description of proposed emissions unit(s):  
**Modification to increase emission limitations to 5 paint spray booths, identified as Paint Line 2.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

**Part I - GENERAL TERMS AND CONDITIONS****A. 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 reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

## 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.

Blackhawk Automotive Plastics, Inc.

Facility ID: **0388010116**

PTI Application: **03-13997**

**Issued: 9/4/2003**

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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 this Permit To Install.

## 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 of 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, the State, and citizens 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 To Install 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.

**B. State Only Enforceable Permit To Install General Terms and Conditions****1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

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

**4. Termination of Permit To Install**

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

## **5. Construction of New Sources(s)**

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

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

## **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**

Blackhawk Automotive Plastics, Inc.

Facility ID: **0388010116**

PTI Application: **03-13997**

**Issued: 9/4/2003**

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

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	39.10
PE	4.60

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Blackhawk Automotive Plastics, Inc.

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**Issued: 9/4/2003**

Emissions Unit ID: R041

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
R041 - plastic parts spray booth (V1) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-31-05(D)
		OAC rule 3745-21-07(G)(2)

Applicable Emissions  
Limitations/Control  
Measures

see Section A.I.2.b.

Use of dry filtration

0.21 lb particulate emissions (PE)/hour, 0.92 ton PE/year

0% opacity as a six-minute average

16.83 lbs organic compounds (OC)/hour from coating materials (see A.I.2.c)

0.42 ton OC/month from cleanup materials (see A.II.2)

39.10 tons OC/year from coating and cleanup materials

Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials (see Section A.I.2.a.)

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day (see Section A.I.2.d)

see Section A.I.2.b.

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Emissions Unit ID: R041

## 2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitations for emissions units R041, R042, R043, R044 and R045 combined of 39.10 tons of OC per rolling, 365-day period from coating and cleanup materials, for the purpose of avoiding PSD applicability (see A.III.6).

For the purpose of federal enforceability, emission limitations on OC's will effectively restrict emission of VOC's.

Emissions units R041, R042, R043, R044 and R045 are existing coating operations, previously established in Permit to Install (PTI) 03-9403 which was issued on April 9, 1997 and, as such, has existing records of emissions of OC in lieu of establishing federally enforceable restrictions for the first year.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This emissions unit is subject to 16.83 lbs OC/hour from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in A.I.2.d.
- 2.d** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on each day any photochemically reactive coating is used.

## II. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for coating and cleanup operations:
  - a. the name and identification number of each coating and cleanup material employed; and
  - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material.

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. On any day when only a non-photochemically reactive coating material is employed, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the name and identification number of each non-photochemically reactive coating material employed;
  - b. the OC content of each non-photochemically reactive coating material, in pounds per gallon, as applied;
  - c. the number of gallons of each non-photochemically reactive coating material employed;
  - d. the OC emission rate from each non-photochemically reactive coating material employed (b x c); and
  - e. the total OC emission rate from each non-photochemically reactive coating material employed, (summation of d).
  
4. On any day when a photochemically reactive coating is employed, the permittee shall collect and record the following daily records for this emissions unit for all coatings (both photochemically reactive and non-photochemically reactive) employed:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emission rate for each coating, in pounds (b x c);
  - e. the total OC emission rate for all coatings, in pounds (sum of d for all coatings);
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all photochemically reactive coatings, in pounds per hour (e / f).
  
5. The permittee shall collect and record the following each day for cleanup material usage:
  - a. the company name and identification for each cleanup material employed;

- b. the OC content of each cleanup material, as applied, in pounds per gallon, as applied;
- c. the number of gallons of each cleanup material employed;
- d. the OC emission rate for each cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
- e. the total OC emission rate for all cleanup materials, summation of (d) in tons per month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are used for reclamation:

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

6. In conjunction with the monitoring and recordkeeping in A.III.3, A.III.4 and A.III.5, the permittee shall collect and record each day the rolling, 365-day summation of OC emissions from all coating and cleanup material usage, in tons.

#### 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 dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from coating with a photochemically reactive material exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from coating with a photochemically reactive material exceeded 40 pounds per day, and the actual organic compound emissions from the coating with a photochemically reactive material for each such day.
  - c. An identification of each day during which a photochemically reactive material was

employed for cleanup operations.

- d. Any exceedance of the 39.10 tons OC from coating and cleanup materials per rolling, 365-day period for emissions units R041, R042, R043, R044 and R045 combined.
- e. An identification of each month during which the OC emissions from cleanup operations exceeded 0.42 tons per month.

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

**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**  
0.21 lb PE/hour, 0.92 ton PE/year

**Applicable Compliance Method**

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) (1-CE)$$

where:

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

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 (assumed to be 40%)

CE = Control Efficiency of the control equipment (assumed to be 95%)

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

- b. **Emission Limitation**  
0% opacity as a six-minute average

**Applicable Compliance Method**

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

- c. **Emission Limitation**  
16.83 lbs OC/hour from coating materials

**Applicable Compliance Method**

The hourly OC emission limitation is based on the emission unit's potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method

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**Issued: 9/4/2003**

Emissions Unit ID: R041

calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit was based on a company supplied worst-case OC content of 5.61 lbs per gallon and a maximum hourly usage rate of 3.00 gallons per hour.

- d. **Emission Limitation**  
0.42 ton OC/month from cleanup materials  
  
**Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.5.
  
- e. **Emission Limitation**  
39.10 tons OC/year for coating and cleanup materials  
  
**Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
  
- f. **Emission Limitation**  
Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials  
  
**Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
  
- g. **Emission Limitation**  
OC emissions shall not exceed 8 pounds/hour and 40 pounds/day  
  
**Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.4.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R041 - plastic parts spray booth (V1) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	See B.III.1	See B.III.1

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit R041 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone  
 TLV (mg/m<sup>3</sup>): 77  
 Maximum Hourly Emission Rate (lbs/hr): 26.16\*  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m<sup>3</sup>): 1035  
 MAGLC (ug/m<sup>3</sup>): 1834

\*The maximum hourly emission rate is based on the worst-case scenario that two booths could be potentially be spraying the same coating. This is a combined lb/hr.

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R042 - plastic parts spray booth (V2) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(D)	OAC rule 3745-17-07(A)
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions  
Limitations/Control  
Measures

see Section A.I.2.b.

Use of dry filtration

0.21 lb particulate emissions (PE)/hour, 0.92 ton PE/year

0% opacity as a six-minute average

16.83 lbs organic compounds (OC)/hour from coating materials (see A.I.2.c)

0.42 ton OC/month from cleanup materials (see A.II.2)

39.10 tons OC/year from coating and cleanup materials

Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials (see Section A.I.2.a.)

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day (see Section A.I.2.d)

see Section A.I.2.b.

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## 2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitations for emissions units R041, R042, R043, R044 and R045 combined of 39.10 tons of OC per rolling, 365-day period from coating and cleanup materials, for the purpose of avoiding PSD applicability (see A.III.6).

For the purpose of federal enforceability, emission limitations on OC's will effectively restrict emission of VOC's.

Emissions units R041, R042, R043, R044 and R045 are existing coating operations, previously established in Permit to Install (PTI) 03-9403 which was issued on April 9, 1997 and, as such, has existing records of emissions of OC in lieu of establishing federally enforceable restrictions for the first year.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This emissions unit is subject to 16.83 lbs OC/hour from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in A.I.2.d.
- 2.d** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on each day any photochemically reactive coating is used.

## II. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for coating and cleanup operations:
  - a. the name and identification number of each coating and cleanup material employed; and
  - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material.

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2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. On any day when only a non-photochemically reactive coating material is employed, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the name and identification number of each non-photochemically reactive coating material employed;
  - b. the OC content of each non-photochemically reactive coating material, in pounds per gallon, as applied;
  - c. the number of gallons of each non-photochemically reactive coating material employed;
  - d. the OC emission rate from each non-photochemically reactive coating material employed (b x c); and
  - e. the total OC emission rate from each non-photochemically reactive coating material employed, (summation of d).
  
4. On any day when a photochemically reactive coating is employed, the permittee shall collect and record the following daily records for this emissions unit for all coatings (both photochemically reactive and non-photochemically reactive) employed:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emission rate for each coating, in pounds (b x c);
  - e. the total OC emission rate for all coatings, in pounds (sum of d for all coatings);
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all photochemically reactive coatings, in pounds per hour (e / f).
  
5. The permittee shall collect and record the following each day for cleanup material usage:
  - a. the company name and identification for each cleanup material employed;

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- b. the OC content of each cleanup material, as applied, in pounds per gallon, as applied;
- c. the number of gallons of each cleanup material employed;
- d. the OC emission rate for each cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
- e. the total OC emission rate for all cleanup materials, summation of (d) in tons per month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are used for reclamation:

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

6. In conjunction with the monitoring and recordkeeping in A.III.3, A.III.4 and A.III.5, the permittee shall collect and record each day the rolling, 365-day summation of OC emissions from all coating and cleanup material usage, in tons.

**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 dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from coating with a photochemically reactive material exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from coating with a photochemically reactive material exceeded 40 pounds per day, and the actual organic compound emissions from the coating with a photochemically reactive material for each such day.
  - c. An identification of each day during which a photochemically reactive material was employed for cleanup operations.
  - d. Any exceedance of the 39.10 tons OC from coating and cleanup materials per rolling, 365-day period for emissions units R041, R042, R043, R044 and R045 combined.
  - e. An identification of each month during which the OC emissions from cleanup operations

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exceeded 0.42 tons per month.

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

## 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**  
0.21 lb PE/hour, 0.92 ton PE/year

### **Applicable Compliance Method**

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) (1-CE)$$

where:

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

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 (assumed to be 40%)

CE = Control Efficiency of the control equipment (assumed to be 95%)

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

- b. **Emission Limitation**  
0% opacity as a six-minute average

### **Applicable Compliance Method**

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

- c. **Emission Limitation**  
16.83 lbs OC/hour from coating materials

### **Applicable Compliance Method**

The hourly OC emission limitation is based on the emission unit's potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method

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calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit was based on a company supplied worst-case OC content of 5.61 lbs per gallon and a maximum hourly usage rate of 3.00 gallons per hour.

- d. **Emission Limitation**  
0.42 ton OC/month from cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.5.
- e. **Emission Limitation**  
39.10 tons OC/year for coating and cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
- f. **Emission Limitation**  
Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
- g. **Emission Limitation**  
OC emissions shall not exceed 8 pounds/hour and 40 pounds/day
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.4.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R042 - plastic parts spray booth (V2) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	See B.III.1	See B.III.1

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit R042 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone

TLV (mg/m<sup>3</sup>): 77

Maximum Hourly Emission Rate (lbs/hr): 26.16\*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1035

MAGLC (ug/m<sup>3</sup>): 1834

\*The maximum hourly emission rate is based on the worst-case scenario that two booths could be potentially be spraying the same coating. This is a combined lb/hr.

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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- 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.

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
R043 - plastic parts spray booth (V3) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions  
Limitations/Control  
Measures

see Section A.I.2.b.

Use of dry filtration

0.21 lb particulate emissions  
(PE)/hour, 0.92 ton PE/year

0% opacity as a six-minute  
average

16.83 lbs organic  
compounds (OC)/hour from  
coating materials (see  
A.I.2.c)

0.42 ton OC/month from  
cleanup materials (see  
A.II.2)

39.10 tons OC/year from  
coating and cleanup  
materials

Combined limit for R041,  
R042, R043, R044 and  
R045: 39.10 tons OC per  
rolling, 365-day period from  
coating and cleanup  
materials (see Section  
A.I.2.a.)

OC emissions shall not  
exceed 8 pounds/hour and  
40 pounds/day (see Section  
A.I.2.d)

see Section A.I.2.b.

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PTI Application: **02 12007**

**Issued**

Facility ID: **0388010116**

Emissions Unit ID: R043

## 2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitations for emissions units R041, R042, R043, R044 and R045 combined of 39.10 tons of OC per rolling, 365-day period from coating and cleanup materials, for the purpose of avoiding PSD applicability (see A.III.6).

For the purpose of federal enforceability, emission limitations on OC's will effectively restrict emission of VOC's.

Emissions units R041, R042, R043, R044 and R045 are existing coating operations, previously established in Permit to Install (PTI) 03-9403 which was issued on April 9, 1997 and, as such, has existing records of emissions of OC in lieu of establishing federally enforceable restrictions for the first year.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This emissions unit is subject to 16.83 lbs OC/hour from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in A.I.2.d.
- 2.d** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on each day any photochemically reactive coating is used.

## II. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for coating and cleanup operations:
  - a. the name and identification number of each coating and cleanup material employed; and
  - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material.

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2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. On any day when only a non-photochemically reactive coating material is employed, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the name and identification number of each non-photochemically reactive coating material employed;
  - b. the OC content of each non-photochemically reactive coating material, in pounds per gallon, as applied;
  - c. the number of gallons of each non-photochemically reactive coating material employed;
  - d. the OC emission rate from each non-photochemically reactive coating material employed (b x c); and
  - e. the total OC emission rate from each non-photochemically reactive coating material employed, (summation of d).
  
4. On any day when a photochemically reactive coating is employed, the permittee shall collect and record the following daily records for this emissions unit for all coatings (both photochemically reactive and non-photochemically reactive) employed:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emission rate for each coating, in pounds (b x c);
  - e. the total OC emission rate for all coatings, in pounds (sum of d for all coatings);
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all photochemically reactive coatings, in pounds per hour (e / f).
  
5. The permittee shall collect and record the following each day for cleanup material usage:
  - a. the company name and identification for each cleanup material employed;

- b. the OC content of each cleanup material, as applied, in pounds per gallon, as applied;
- c. the number of gallons of each cleanup material employed;
- d. the OC emission rate for each cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
- e. the total OC emission rate for all cleanup materials, summation of (d) in tons per month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are used for reclamation:

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

6. In conjunction with the monitoring and recordkeeping in A.III.3, A.III.4 and A.III.5, the permittee shall collect and record each day the rolling, 365-day summation of OC emissions from all coating and cleanup material usage, in tons.

#### 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 dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from coating with a photochemically reactive material exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from coating with a photochemically reactive material exceeded 40 pounds per day, and the actual organic compound emissions from the coating with a photochemically reactive material for each such day.
  - c. An identification of each day during which a photochemically reactive material was

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employed for cleanup operations.

- d. Any exceedance of the 39.10 tons OC from coating and cleanup materials per rolling, 365-day period for emissions units R041, R042, R043, R044 and R045 combined.
- e. An identification of each month during which the OC emissions from cleanup operations exceeded 0.42 tons per month.

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

**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**  
0.21 lb PE/hour, 0.92 ton PE/year

**Applicable Compliance Method**

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) (1-CE)$$

where:

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

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 (assumed to be 40%)

CE = Control Efficiency of the control equipment (assumed to be 95%)

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

- b. **Emission Limitation**  
0% opacity as a six-minute average

**Applicable Compliance Method**

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

- c. **Emission Limitation**  
16.83 lbs OC/hour from coating materials

**Applicable Compliance Method**

The hourly OC emission limitation is based on the emission unit's potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method

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calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit was based on a company supplied worst-case OC content of 5.61 lbs per gallon and a maximum hourly usage rate of 3.00 gallons per hour.

- d. **Emission Limitation**  
0.42 ton OC/month from cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.5.

- e. **Emission Limitation**  
39.10 tons OC/year for coating and cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.6.

- f. **Emission Limitation**  
Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.6.

- g. **Emission Limitation**  
OC emissions shall not exceed 8 pounds/hour and 40 pounds/day

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.4.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R043 - plastic parts spray booth (V3) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	See B.III.1	See B.III.1

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit R043 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone

TLV (mg/m<sup>3</sup>): 77

Maximum Hourly Emission Rate (lbs/hr): 26.16\*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1035

MAGLC (ug/m<sup>3</sup>): 1834

\*The maximum hourly emission rate is based on the worst-case scenario that two booths could be potentially be spraying the same coating. This is a combined lb/hr.

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

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Emissions Unit ID: R043

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
R044 - plastic parts spray booth (V4) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions  
Limitations/Control  
Measures

see Section A.I.2.b.

Use of dry filtration

0.21 lb particulate emissions (PE)/hour, 0.92 ton PE/year

0% opacity as a six-minute average

16.83 lbs organic compounds (OC)/hour from coating materials (see A.I.2.c)

0.42 ton OC/month from cleanup materials (see A.II.2)

39.10 tons OC/year from coating and cleanup materials

Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials (see Section A.I.2.a.)

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day (see Section A.I.2.d)

see Section A.I.2.b.

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Emissions Unit ID: R044

## 2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitations for emissions units R041, R042, R043, R044 and R045 combined of 39.10 tons of OC per rolling, 365-day period from coating and cleanup materials, for the purpose of avoiding PSD applicability (see A.III.6).

For the purpose of federal enforceability, emission limitations on OC's will effectively restrict emission of VOC's.

Emissions units R041, R042, R043, R044 and R045 are existing coating operations, previously established in Permit to Install (PTI) 03-9403 which was issued on April 9, 1997 and, as such, has existing records of emissions of OC in lieu of establishing federally enforceable restrictions for the first year.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This emissions unit is subject to 16.83 lbs OC/hour from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in A.I.2.d.
- 2.d** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on each day any photochemically reactive coating is used.

## II. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for coating and cleanup operations:
  - a. the name and identification number of each coating and cleanup material employed; and
  - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material.

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Emissions Unit ID: R044

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. On any day when only a non-photochemically reactive coating material is employed, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the name and identification number of each non-photochemically reactive coating material employed;
  - b. the OC content of each non-photochemically reactive coating material, in pounds per gallon, as applied;
  - c. the number of gallons of each non-photochemically reactive coating material employed;
  - d. the OC emission rate from each non-photochemically reactive coating material employed (b x c); and
  - e. the total OC emission rate from each non-photochemically reactive coating material employed, (summation of d).
  
4. On any day when a photochemically reactive coating is employed, the permittee shall collect and record the following daily records for this emissions unit for all coatings (both photochemically reactive and non-photochemically reactive) employed:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emission rate for each coating, in pounds (b x c);
  - e. the total OC emission rate for all coatings, in pounds (sum of d for all coatings);
  - f. the number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all photochemically reactive coatings, in pounds per hour (e / f).
  
5. The permittee shall collect and record the following each day for cleanup material usage:
  - a. the company name and identification for each cleanup material employed;

- b. the OC content of each cleanup material, as applied, in pounds per gallon, as applied;
- c. the number of gallons of each cleanup material employed;
- d. the OC emission rate for each cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
- e. the total OC emission rate for all cleanup materials, summation of (d) in tons per month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are used for reclamation:

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

6. In conjunction with the monitoring and recordkeeping in A.III.3, A.III.4 and A.III.5, the permittee shall collect and record each day the rolling, 365-day summation of OC emissions from all coating and cleanup material usage, in tons.

#### 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 dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from coating with a photochemically reactive material exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from coating with a photochemically reactive material exceeded 40 pounds per day, and the actual organic compound emissions from the coating with a photochemically reactive material for each such day.
  - c. An identification of each day during which a photochemically reactive material was

employed for cleanup operations.

- d. Any exceedance of the 39.10 tons OC from coating and cleanup materials per rolling, 365-day period for emissions units R041, R042, R043, R044 and R045 combined.
- e. An identification of each month during which the OC emissions from cleanup operations exceeded 0.42 tons per month.

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

**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**  
0.21 lb PE/hour, 0.92 ton PE/year

**Applicable Compliance Method**

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) (1-CE)$$

where:

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

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 (assumed to be 40%)

CE = Control Efficiency of the control equipment (assumed to be 95%)

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

- b. **Emission Limitation**  
0% opacity as a six-minute average

**Applicable Compliance Method**

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

- c. **Emission Limitation**  
16.83 lbs OC/hour from coating materials

**Applicable Compliance Method**

The hourly OC emission limitation is based on the emission unit's potential to emit\*. Therefore, no hourly record keeping, deviation reporting, or compliance method

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calculations are required to demonstrate compliance with this limitation.

\*The potential to emit for this emissions unit was based on a company supplied worst-case OC content of 5.61 lbs per gallon and a maximum hourly usage rate of 3.00 gallons per hour.

- d. **Emission Limitation**  
0.42 ton OC/month from cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.5.
- e. **Emission Limitation**  
39.10 tons OC/year for coating and cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
- f. **Emission Limitation**  
Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.6.
- g. **Emission Limitation**  
OC emissions shall not exceed 8 pounds/hour and 40 pounds/day
- Applicable Compliance Method**  
Compliance shall be based upon the recordkeeping specified in section A.III.4.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R044 - plastic parts spray booth (V4) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	See B.III.1	See B.III.1

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit R044 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone  
 TLV (mg/m<sup>3</sup>): 77  
 Maximum Hourly Emission Rate (lbs/hr): 26.16\*  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m<sup>3</sup>): 1035  
 MAGLC (ug/m<sup>3</sup>): 1834

\*The maximum hourly emission rate is based on the worst-case scenario that two booths could be potentially be spraying the same coating. This is a combined lb/hr.

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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- 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.

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
R045 - plastic parts spray booth (V5) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions  
Limitations/Control  
Measures

see Section A.I.2.b.

Use of dry filtration

0.21 lb particulate emissions (PE)/hour, 0.92 ton PE/year

0% opacity as a six-minute average

16.83 lbs organic compounds (OC)/hour from coating materials (see A.I.2.c)

0.42 ton OC/month from cleanup materials (see A.II.2)

39.10 tons OC/year from coating and cleanup materials

Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials (see Section A.I.2.a.)

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day (see Section A.I.2.d)

see Section A.I.2.b.

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Emissions Unit ID: R045

## 2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitations for emissions units R041, R042, R043, R044 and R045 combined of 39.10 tons of OC per rolling, 365-day period from coating and cleanup materials, for the purpose of avoiding PSD applicability (see A.III.6).

For the purpose of federal enforceability, emission limitations on OC's will effectively restrict emission of VOC's.

Emissions units R041, R042, R043, R044 and R045 are existing coating operations, previously established in Permit to Install (PTI) 03-9403 which was issued on April 9, 1997 and, as such, has existing records of emissions of OC in lieu of establishing federally enforceable restrictions for the first year.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** This emissions unit is subject to 16.83 lbs OC/hour from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in A.I.2.d.
- 2.d** This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on each day any photochemically reactive coating is used.

## II. Operational Restrictions

1. The use of photochemically reactive materials for cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the dry filtration system when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for coating and cleanup operations:
  - a. the name and identification number of each coating and cleanup material employed; and
  - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material.

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2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

3. On any day when only a non-photochemically reactive coating material is employed, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the name and identification number of each non-photochemically reactive coating material employed;
  - b. the OC content of each non-photochemically reactive coating material, in pounds per gallon, as applied;
  - c. the number of gallons of each non-photochemically reactive coating material employed;
  - d. the OC emission rate from each non-photochemically reactive coating material employed (b x c); and
  - e. the total OC emission rate from all non-photochemically reactive coating material employed, (summation of d); and
  - f. the total OC emission rate for all coatings employed, multiplied by the maximum percentage of the emissions associated with this emissions unit (as identified in A.III.7 of this permit), in pounds per day.
  
4. On any day when a photochemically reactive coating is employed, the permittee shall collect and record the following daily records for this emissions unit for all coatings (both photochemically reactive and non-photochemically reactive) employed:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, in pounds per gallon, as applied;
  - d. the OC emission rate for each coating, in pounds per day (b x c);
  - e. the total OC emission rate for all coatings, in pounds per day (sum of d for all coatings);
  - f. the total OC emission rate for all coatings employed, multiplied by the maximum percentage of the emissions associated with this emissions unit (as identified in A.III.7 of this permit), in pounds per day;
  - g. the number of hours the emissions unit was in operation; and

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- h. the average hourly OC emission rate for all photochemically reactive coatings, in pounds per hour (f/ g).
5. The permittee shall collect and record the following each day for cleanup material usage:

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- a. the company name and identification for each cleanup material employed;
- b. the OC content of each cleanup material, as applied, in pounds per gallon, as applied;
- c. the number of gallons of each cleanup material employed;
- d. the OC emission rate for each cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
- e. the total OC emission rate for all cleanup materials, summation of (d) in tons per month;

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are used for reclamation:

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

6. In conjunction with the monitoring and recordkeeping in A.III.3, A.III.4 and A.III.5, the permittee shall collect and record each day the rolling, 365-day summation of OC emissions from all coating and cleanup material usage, in tons.
7. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven P004, the permittee shall utilize a value to be determined (through testing requirements for emissions unit P004 contained in the facility's final Title V permit issued October 16, 2002) as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining percentage of organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven.

#### **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 dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 include the following information:

- a. An identification of each day during which the average hourly organic compound emissions from coating with a photochemically reactive material exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
- b. An identification of each day during which the organic compound emissions from coating with a photochemically reactive material exceeded 40 pounds per day, and the actual organic compound emissions from the coating with a photochemically reactive material for each such day.
- c. An identification of each day during which a photochemically reactive material was employed for cleanup operations.
- d. Any exceedance of the 39.10 tons OC from coating and cleanup materials per rolling, 365-day period for emissions units R041, R042, R043, R044 and R045 combined.
- e. An identification of each month during which the OC emissions from cleanup operations exceeded 0.42 tons per month.

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

## 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**  
0.21 lb PE/hour, 0.92 ton PE/year

### **Applicable Compliance Method**

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) (1-CE)$$

where:

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

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 (assumed to be 40%)

CE = Control Efficiency of the control equipment (assumed to be 95%)

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

b. **Emission Limitation**

0% opacity as a six-minute average

**Applicable Compliance Method**

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

c. **Emission Limitation**

16.83 lbs OC/hour from coating materials

**Applicable Compliance Method**

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

\*The potential to emit for this emissions unit was based on a company supplied worst-case OC content of 5.61 lbs per gallon and a maximum hourly usage rate of 3.00 gallons per hour.

d. **Emission Limitation**

0.42 ton OC/month from cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.5.

e. **Emission Limitation**

39.10 tons OC/year for coating and cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.6.

f. **Emission Limitation**

Combined limit for R041, R042, R043, R044 and R045: 39.10 tons OC per rolling, 365-day period from coating and cleanup materials

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.6.

g. **Emission Limitation**

OC emissions shall not exceed 8 pounds/hour and 40 pounds/day

**Applicable Compliance Method**

Compliance shall be based upon the recordkeeping specified in section A.III.4.

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R045 - plastic parts spray booth (V5) Modification to PTI 03-9403, issued 4/9/97. (Modification to increase lb/hr and synthetic minor group emission limitations.)	See B.III.1	See B.III.1

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit R045 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone

TLV (mg/m<sup>3</sup>): 77

Maximum Hourly Emission Rate (lbs/hr): 26.16\*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 1035

MAGLC (ug/m<sup>3</sup>): 1834

\*The maximum hourly emission rate is based on the worst-case scenario that two booths could be potentially be spraying the same coating. This is a combined lb/hr.

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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- 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.

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**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None