

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

Permit To Install **05-14175**

A. Source Description:

AGC Automotive has an automobile glass coating and manufacturing plant at 1465 W. Sandusky Ave., Bellefontaine, Logan County, Ohio. This Permit to Install (PTI) is to cover the installation of 2 encapsulation lines and to limit the overall facility Hazardous Air Pollutant(s) (HAP(s)) emission rates to below the threshold limits of Title V.

B. Facility Emissions and Attainment Status:

Logan County is attainment for all criteria pollutants. The AGC Automotive Plant is defined as a non-major stationary source for all criteria pollutants thresholds under Prevention of Significant Deterioration (PSD) standards and Title V requirements.

C. Source Emissions:

This PTI will cover 2 encapsulation lines:

1. R024, TP-8 PVC Encapsulation Line, to include primer application, infrared heating, seal and tape application station. This emission unit will at times employ photochemically reactive materials (PRM). On the days the PRM is employed the OC emissions will need to comply with the emission restriction of OAC rule 3745-21-07(G)(2) for all materials employed in this emission unit, including cleanup. The maximum potential from this emission unit is 0.41 lbs of OC per hour and 1.80 tons per year. The HAP(s) emissions from the entire facility will be limited to 12-month rolling limitations and verified by the use of record keeping and reporting requirements.
2. R025, TP-5 PVC Encapsulation Line to include primer application, infrared heating, seal and tape application station. This emission unit will at times employ photochemically reactive materials (PRM). On the days the PRM is employed the OC emissions will need to comply with the emission restriction of OAC rule 3745-21-07(G)(2) for all materials employed in this emission unit, including cleanup. The maximum potential from this emission unit is 0.41 lbs of OC per hour and 1.80 tons per year. The HAP(s) emissions from the entire facility will be limited to 12-month rolling limitations and verified by the use of record keeping and reporting requirements.

In all, these installations will not trigger Federal requirements and the permit will assure this facility maintains enforceable limits to assure compliance.

D. Conclusion:

AGC Automotive desires to remain a minor source for Title V, even though facility actual emissions are approaching 100 tons/year VOC. The federally enforceable terms and conditions of this permit will allow the facility to maintain minor status for Title V.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL



Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 05-14175

Fac ID: 0546000103

DATE: 4/25/2006

AGC Automotive
Jeanie Weiskittle
1465 W Sandusky Ave
Bellefontaine, OH 433110819

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

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

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

Sincerely,

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

CC: USEPA

SWDO

IN

LOGAN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-14175** FOR AN AIR CONTAMINANT SOURCE FOR
AGC Automotive

On 4/25/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **AGC Automotive**, located at **1465 W Sandusky Ave, Bellefontaine, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14175:

The PTI is for the installation of two PVC encapsulation lines at the Bellefontaine facility.

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

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-14175

Application Number: 05-14175
Facility ID: 0546000103
Permit Fee: **To be entered upon final issuance**
Name of Facility: AGC Automotive
Person to Contact: Jeanie Weiskittle
Address: 1465 W Sandusky Ave
Bellefontaine, OH 433110819

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1465 W Sandusky Ave
Bellefontaine, Ohio**

Description of proposed emissions unit(s):
The PTI is for the installation of two PVC encapsulation lines at the Bellefontaine facility.

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

AGC Automotive

PTI Application: 05-14175

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0546000103

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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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.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate 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.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

AGC Automotive
PTI Application: 05 14175
Issue

Facility ID: 0546000103

Emissions Unit ID: R024

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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	3.60
Individual HAP	9.0
Combined HAP's	24.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R024 - PVC TP-8, Encapsulation Line, to include primer application, infrared heating, seal and tape application station.	OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions shall not exceed 0.41 pounds per hour. OC emissions shall not exceed 1.80 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC Rule 3745-35-07(B) Synthetic Minor to avoid Title V	See Section A.2b See Section A.2.a
	OAC rule 3745-21-07(G)(2)	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. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the emissions units at this facility (K006, K009, R001, R005, R008, R009, R010, R011, R012, R024, and R025) shall not exceed 9.0 tons per year for any single HAP and 24.0 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.
- 2.b** The hourly and annual emissions limitations for OC have been established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the limitations, except on days when photochemically reactive materials are used.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation, when employing photochemically reactive materials:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the

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average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP containing material employed, in pounds of individual HAP per gallon, as applied;
 - c. the total combined HAPs content for each HAP containing material employed, in pounds of combined HAPs per gallon, as applied (sum all the individual HAP contents from b).
 - d. The amount of each HAP containing material applied, in gallons;
 - e. the total individual HAP usage and emissions for each HAP from the above listed materials employed, in tons per month [for each HAP the sum of (b) times (d), divided by 2000 pounds/ton];
 - f. the total combined HAP usage and emissions from all above listed materials employed, in tons per month [the sum of (c) times (d), divided by 2000 pounds/ton];
 - g. the rolling, 12-month individual HAP emissions (for each HAP), in tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the rolling, 12-month combined HAPs emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 3.28

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 122.1

MAGLC (ug/m3): 4485.8

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

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- 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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations 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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 0.41 pounds per hour, and the actual average hourly organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that include the

following information:

- a. an identification of each month during which the individual HAP emissions exceed 9.0 tons per year, based on a 12-month rolling summation; and
- b. an identification of each month during which the combined HAP's emissions exceed 24.0 tons per year, based on a 12-month rolling summation.

E. Testing Requirements

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

- a. **Emission Limitation:**

0.41 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the following methodology:

$$E_h = C_u * OC_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.059 gallons per hour); and

OC_c = Maximum OC content (6.94 lbs/gal)

2. Compliance with the HAP emissions limitation in term A.2.a shall be determined by the record keeping in term C.2.

AGC

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **R024**

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., C.2., D. and E.

**AGC ,
PTI A**

Emissions Unit ID: **R025**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R025 - PVC TP-5 Encapsulation Line to include primer application, infrared heating, seal and tape application station.	OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions shall not exceed 0.41 pounds per hour.
		OC emissions shall not exceed 1.80 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
		See Section A.2b
	OAC Rule 3745-35-07(B) Synthetic Minor to avoid Title V	See Section A.2.a
	OAC rule 3745-21-07(G)(2)	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. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the emissions units at this facility (K006, K009, R001, R005, R008, R009, R010, R011, R012, R024, and R025) shall not exceed 9.0 tons per year for any single HAP and 24.0 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.
- 2.b** The hourly and annual emissions limitations for OC have been established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the limitations, except on days when photochemically reactive materials are used.

B. Operational Restrictions

none

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation, when employing photochemically reactive materials:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the

Emissions Unit ID: **R025**

average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP containing material employed, in pounds of individual HAP per gallon, as applied;
 - c. the total combined HAPs content for each HAP containing material employed, in pounds of combined HAPs per gallon, as applied (sum all the individual HAP contents from b).
 - d. The amount of each HAP containing material applied, in gallons;
 - e. the total individual HAP usage and emissions for each HAP from the above listed materials employed, in tons per month [for each HAP the sum of (b) times (d), divided by 2000 pounds/ton];
 - f. the total combined HAP usage and emissions from all above listed materials employed, in tons per month [the sum of (c) times (d), divided by 2000 pounds/ton];
 - g. the rolling, 12-month individual HAP emissions (for each HAP), in tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the rolling, 12-month combined HAPs emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

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3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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):

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

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

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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations 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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 0.41 pounds per hour, and the actual average hourly organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

Issued: To be entered upon final issuance

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the individual HAP emissions exceed 9.0 tons per year, based on a 12-month rolling summation; and
 - b. an identification of each month during which the combined HAP's emissions exceed 24.0 tons per year, based on a 12-month rolling summation.

E. Testing Requirements

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

- a. **Emission Limitation:**

0.41 pounds per hour OC, from coatings employed.

- a. **Applicable Compliance Method:**

The permittee shall demonstrate compliance with the above limit based upon the following methodology:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.059 gallons per hour); and

$O C_c$ = Maximum OC content (6.94 lbs/gal)

2. Compliance with the HAP emissions limitation in term A.2.a shall be determined by the record keeping in term C.2.

F. Miscellaneous Requirements

AGC Automotive
PTI Application: 05 11175
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Facility ID: 0546000103

Emissions Unit ID: R025

1. The following terms and conditions are federally enforceable: A., B., C.1., C.2., D. and E.