

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **05-14377**

A. Source Description:

AGC Automotive Americas Company, has a vehicle window production facility at 1465 W. Sandusky Ave., Bellefontaine, Ohio. This Permit to Install (PTI) is to cover increases in the amount of materials processed and limit this facility below Title V thresholds.

B. Facility Emissions and Attainment Status:

Logan County is attainment for all criteria pollutants. The AGC Automotive Americas Company is defined as a non-major stationary source for all criteria pollutants thresholds under Federal and Title V Threshold. Based on data provided by AGC Automotive Americas Company and the attached Special Terms and Conditions (ST&C's), along with the Organic Compound (OC) emissions from emission units R024 and R025 covered in PTI 05-14175, the facility-wide OC emissions will be 93.2 tons. Fugitive emissions from facility-wide use of cleanup materials accounts for 13.00 tons of OC per year. After taking the fugitive emission away from the total allowable, the overall stacked OC allowable emission from emission units covered under this PTI is 89.60 tons per year, which will maintain this facility below the Title V threshold.

C. Source Emissions:

This PTI will cover the addition of seven new emission units, the dividing of four existing units into eight separate independent emission units with their own equipment and processes; changes in the allowable emission rates of existing emission units to assure that OC emissions are minimized and the use of Federally Enforceable limits that will maintain this facility as a Title V Synthetic Minor. This permit contains 22 emission units that include:

1. K006, BL-3 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

2. K009, BTP-4 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

3. R001, BT-3 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day,

whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

4. R004, BL-1, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

5. R005, BT-01 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

6. R007, BTP-1 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

7. R008, BL-2 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

8. R009, BTP-3 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

9. R010, BTP-2 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

10. R011, BTP-5 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

11. R012, BTP-6, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

12. R013, BE2 PVC Encapsulation Line, Coating Operation. The allowable OC emissions rates from this emission unit are: the total OC emissions from the coatings employed in this emission unit shall not exceed: 1.80 tons per rolling 12 month period; 0.35 lbs/hr; nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. At present there is 0 VOC emissions from the cleanup operation employed in this emission unit. This emission unit emits; Ethyl Alcohol, Iso-propyl Alcohol, Methyl Iso-Butyl Ketone (MIBK), –Butyl Acetate, Toluene, Acetone, and Methyl Alcohol. The calculated in-stack concentration for all Air Toxic's are below the MAGLC's. **Please note that the 0.35 lbs of OC /hour is for coating usage only, the facility has a combined OC emission limitation from its cleanup materials, since it is possible that the cleanup materials may be defined as Photochemically Reactive Materials (PRM's) the 40 lb OC /day limitation is still needed.**

13. R014, BE4 PVC Encapsulation Line, Coating Operation. The allowable OC emissions rates from this emission unit are: the total OC emissions from the coatings employed in this emission unit shall not exceed: 1.80 tons per rolling 12 month period; 0.35 lbs/hr; nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. At present there is 0 VOC emissions from the cleanup operation employed in this emission unit. This emission unit emits; Ethyl Alcohol, Iso-propyl Alcohol, Methyl Iso-Butyl Ketone (MIBK), –Butyl Acetate, Toluene, Acetone, and Methyl Alcohol. The calculated in-stack concentration for all Air Toxic's are below the MAGLC's. **Please note that the 0.35 lbs of OC /hour is for coating usage only, the facility has a combined OC emission limitation from its cleanup materials, since it is possible that the cleanup materials may be defined as Photochemically Reactive Materials (PRM's) the 40 lb OC /day limitation is still needed.**

14. R015, B83 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission

unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

15. R016, B84 Ceramic, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

16. R017, B83 Silver, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

17. R018, B84 Silver, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the silver coatings operations, emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit Xylene. The in-stack concentration is below the MAGLC for this toxic pollutant.

18. R019, BT-3 Silver 1, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the silver coatings operations, emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit Xylene. The in-stack concentration is below the MAGLC for this toxic pollutant.

19. R020, BT-3 Silver 2, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the silver coatings operations, emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling

12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit Xylene. The in-stack concentration is below the MAGLC for this toxic pollutant.

20. R021, BTP-5 Silver, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the silver coatings operations, emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit Xylene. The in-stack concentration is below the MAGLC for this toxic pollutant.

21. R022, BT-1 Silver, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 0.44 lbs/hr, which represents the maximum potential of each silver coating table. This emission unit is also limited according to the following: the total combined OC emissions from the silver coatings operations, emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit Xylene. The in-stack concentration is below the MAGLC for this toxic pollutant.

22. R023, BT-4, Coating Operation. The allowable hourly OC emissions rates from this emission unit is 3.38 lbs/hr, which represents the maximum potential of each ceramic coating table. This emission unit is also limited according to the following: the total combined OC emissions from the ceramic coatings operations, emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 shall not exceed 68.00 tons per rolling 12-month period; the combined cleanup OC emissions from the entire facility-wide operations emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per rolling 12-month period; and the total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit. This emission unit has the potential to emit both Tri-methyl Benzene and Petroleum Distillate. The in-stack concentration is below the MAGLC for both toxic emissions.

D. Conclusion:

AGC-Automotive's has requested to be permitted with Federally enforceable limitations that will maintain them as a Title V Synthetic Minor. Based on their request for Federally Enforceable Limitations and flexibility in the coating usage rates within their facility, the Special Terms and Conditions require thorough recordkeeping and process oversight. All of the emission units covered under this PTI have both maximum hourly rates and rolling combined 12-month emission limitations. Based on the Allowable OC emission rates within this and PTI 05-14175, the Overall Facility OC emissions will be 93.20 tons. This PTI, as well as, PTI 05-14175, require facility-wide HAP and HAP's emissions be maintained below 9.0 tons and 24.0 tons per year, respectively. Based on the below requirements and limitations this facility (source) shall be maintained below the threshold limitations for Title V requirements.



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: 05-14377

Fac ID: 0546000103

DATE: 7/18/2006

AGC Automotive
Jeanie Weiskittle
1465 W Sandusky Ave
Bellefontaine, OH 43311-0819

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 **\$4400** 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



**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 05-14377

Application Number: 05-14377
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 43311-0819

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

Description of proposed emissions unit(s):
PTI for Federally Enforceable Limitations for the whole Facility and the installation of 6 new emission units.

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**Facility ID: 0546000103****PTI Application: 05-14377****Issued: To be entered upon final issuance****Part I - GENERAL TERMS AND CONDITIONS****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,

AGC Automotive**Facility ID: 0546000103****PTI Application: 05-14377****Issued: To be entered upon final issuance**

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

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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

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 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 (Stacked)	76.6
OC (Fugitive)	13.0
OC (Overall)	89.6
HAP	9.0
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.

Operations, Property, and/or Equipment - (K006) - BL-3 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section

Emissions Unit ID: **K006**

112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

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2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

Emissions Unit ID: K006

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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds

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per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine

Emissions Unit ID: **K006**

the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

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F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (K009) - BTP-4 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

Emissions Unit ID: **K009**

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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

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b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

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F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R001) - BT-3 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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- 2.b** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds

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per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine

Emissions Unit ID: R001

the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

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F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R004) - BL-1 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

- a. **Applicable Compliance Method:**

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

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b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

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F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R005) - BT-01-Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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- 2.b** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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

2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

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F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R007) - BTP-1 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

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b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Active Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Active Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R008) - BL-2 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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- 2.b** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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

2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

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b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R009) - BTP-3 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating

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Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022,

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R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds

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per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**
40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine

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the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R010) - BTP-2 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022,

R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

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- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
- 3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**
40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the

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record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R011) - BTP-05-Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022,

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R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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;

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- 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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

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- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**
40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

Issued: To be entered upon final issuance

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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.

Operations, Property, and/or Equipment - (R012) - BTP-6 Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009,

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R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. The permit to install for this emissions unit was evaluated based on the actual materials

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

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Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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.

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2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

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b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R013) - BE-2 PVC Encapsulation Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.41 lbs/hr.</p> <p>The total OC emissions from the coatings employed in this emission unit shall not exceed 1.80 tons per year.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	See Section A.2.b.
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

- 2.a The hourly emission limitation for OC of 0.41 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

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

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(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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in this emission unit:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.

3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.

4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;

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- e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
- f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
- g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

- 5.. 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Methanol

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted In-Stack Concentration: 0.026 ppm

MAGLC (ppm): 4.76

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.18

Predicted In-Stack Concentration: 0.144 ppm

MAGLC (ppm): 1.19

Pollutant: Ethyl Alcohol

TLV (ppm): 1000

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted In-Stack Concentration: 0.14 ppm

MAGLC (ppm): 23.81

Pollutant: Methyl Iso-Butyl Ketone (MIBK)

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted In-Stack Concentration: 0.21 ppm

MAGLC (ppm): 1.19

Pollutant: n-Butyl Acetate

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted In-Stack Concentration: 0.028 ppm

MAGLC (ppm): 1.19

Pollutant: Isopropyl Alcohol

TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted In-Stack Concentration: 0.008 ppm

MAGLC (ppm): 9.52

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Pollutant: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr):0.35

Predicted In-Stack Concentration: 0.28 ppm

MAGLC (ppm): 11.90

7. 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 still 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.

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8. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission unit exceeded 1.80 tons;
 - b. an identification of each 12-month period during which the facility-wide combined

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OC emissions from the use of cleanup materials exceeded 13.00 tons;

- c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

0.41pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

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(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D.

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and E.**

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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.

Operations, Property, and/or Equipment - (R014) - BE-4 PVC Encapsulation Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.41 lbs/hr.</p> <p>The total OC emissions from the coatings employed in this emission unit shall not exceed 1.80 tons per year.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	See Section A.2.b.
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

- 2.a The hourly emission limitation for OC of 0.41 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

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

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(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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in this emission unit:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.

3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.

4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;

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- e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
- f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
- g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

- 5.. 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Methanol

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted In-Stack Concentration: 0.026 ppm

MAGLC (ppm): 4.76

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.18

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Predicted In-Stack Concentration: 0.144 ppm

MAGLC (ppm): 1.19

Pollutant: Ethyl Alcohol

TLV (ppm): 1000

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted In-Stack Concentration: 0.14 ppm

MAGLC (ppm): 23.81

Pollutant: Methyl Iso-Butyl Ketone (MIBK)

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted In-Stack Concentration: 0.21 ppm

MAGLC (ppm): 1.19

Pollutant: n-Butyl Acetate

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.03

Predicted In-Stack Concentration: 0.028 ppm

MAGLC (ppm): 1.19

Pollutant: Isopropyl Alcohol

TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted In-Stack Concentration: 0.008 ppm

MAGLC (ppm): 9.52

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Pollutant: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr):0.35

Predicted In-Stack Concentration: 0.28 ppm

MAGLC (ppm): 11.90

7. 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.

8. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission unit exceeded 1.80 tons;
 - b. an identification of each 12-month period during which the facility-wide combined

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OC emissions from the use of cleanup materials exceeded 13.00 tons;

- c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

0.41pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

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(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

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1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R015) - B83

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022,

R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

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- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
- 3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**
40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the

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record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R016) - B84-Ceramic

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

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2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

- The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120

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1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012,

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R015, R016, and R023:

- a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in

Emissions Unit ID: **R016**

pounds or 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.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

5. 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

E. Testing Requirements

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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:**

40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

- b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

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2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R017) - B83-SILVER

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall

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be based upon a rolling, 12-month summation of the coating usage.

- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

Emissions Unit ID: R017

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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

Emissions Unit ID: R017

- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

- b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

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The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R018) - B84-SILVER

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

Emissions Unit ID: **R018**

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall

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be based upon a rolling, 12-month summation of the coating usage.

- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

Emissions Unit ID: **R018**

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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

Emissions Unit ID: **R018**

- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

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The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R019) - BT3 SILVER TABLE 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

Emissions Unit ID: **R019**

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall

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be based upon a rolling, 12-month summation of the coating usage.

- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

Emissions Unit ID: **R019**

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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

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- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

- b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Emissions Unit ID: R019

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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.

Operations, Property, and/or Equipment - (R020) - BT3 SILVER TABLE 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall

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be based upon a rolling, 12-month summation of the coating usage.

- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

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- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

Emissions Unit ID: R020

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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

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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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

Emissions Unit ID: R020

- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

- b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

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The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R021) - BTP-05-SILVER TABLE

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

Emissions Unit ID: **R021**

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall

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be based upon a rolling, 12-month summation of the coating usage.

- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

Emissions Unit ID: **R021**

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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

Emissions Unit ID: **R021**

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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

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- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

- b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

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The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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.

Operations, Property, and/or Equipment - (R022) - BT-01 SILVER

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.44 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025 shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxics Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 0.44 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section

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112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined silver coating usage in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 1,818 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 1,818 gallons/yr</u>
1	182
1-2	364
1-3	546
1-4	728
1-5	910
1-6	1,092
1-7	1,274
1-8	1,456
1-9	1,638
1-10	1,818
1-11	1,818
1-12	1,818

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

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- 2 The OC content of the coating materials employed shall not exceed 5.5 lbs/gallon, as applied, and the OC content of the Liquid Organic Cleanup Materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted In-Stack Concentration: 0.033 ppm

MAGLC (ppm): 2.38

6. 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

Emissions Unit ID: **R022**

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.

7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:

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- a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units R017, R018, R019, R020, R021, and R022 exceeded 5 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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):

Emissions Unit ID: R022

a. **Emission Limitation:**

40 pounds per day OC, when PRM is employed; and
1.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

0.44 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O C_c$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.08 gallons per hour, from Emission Unit Activity Form); and

$O C_c$ = Maximum OC content (5.5 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 4., D. and E.

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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.

Operations, Property, and/or Equipment - (R023) - BT-4 CERAMIC LOGO

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 3.38 lbs/hr.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of ceramic coatings in emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 68.00 tons per 12 month period.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	<p>The total OC emissions shall not exceed 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.</p>

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for OC of 3.38 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The combined ceramic coating usage in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023, shall not exceed 20,148 gallons per year, based upon a rolling, 12-month summation of all ceramic coatings employed in these emission units.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage of 20,148 gallons/yr</u>
1	2,015
1-2	4,030
1-3	6,045
1-4	8,060
1-5	10,075
1-6	12,090
1-7	14,105
1-8	16,120
1-9	18,135
1-10	20,148
1-11	20,148
1-12	20,148

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for Coating Usage shall be based upon a rolling, 12-month summation of Coating employed.

2. The OC content of the coating materials employed shall not exceed 6.75 lbs/gallon, as applied, and the OC content of the cleanup materials shall not exceed 7.25 lbs/gallon.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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 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 "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).] emission rate, in lbs of OC/hr ("f"/"g").

2. This facility shall maintain the following monthly records on all coatings employed in emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022,

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R023, R024, and R025:

- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or 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.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
5. 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

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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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.78

Predicted In-Stack Concentration: 0.62 ppm

MAGLC (ppm): 7.14

Pollutant: Trimethyl Benzene

TLV (ppm): 25

Maximum Hourly Emission Rate (lbs/hr): 0.34

Predicted In-Stack Concentration: 0.27 ppm

MAGLC (ppm): 0.60

6. 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;

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- 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.

- 7. 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 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

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- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual 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 deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the OC emissions from the coatings employed in this emission units K006, K009, R001, R004, R005, R008, R009, R010, R011, R012, R015, R016, and R023 exceeded 68 tons;
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

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:**
40 pounds per day OC, when PRM is employed; and
4.00 tons per 12-month rolling period OC, from coatings employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the

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record keeping requirements of Sections C.1.d. and C.2.e., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings, inks and cleanup materials.

b. **Emission Limitation:**

3.38 pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$E_h = C_u * O_{C_c}$$

where:

E_h = emission rate (lbs/hr);

C_u = Maximum coating usage (0.5 gallons per hour, from Emission Unit Activity Form); and

O_{C_c} = Maximum OC content (6.75 lbs/gal, from Emission Unit Activity Form)

2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3. 4., D. and E.