

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 05-14410

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 type and amount of materials processed through the silver lines and encapsulation operations 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 K006, K009, R001, R004, R005, R007-R012, R015, R016, and R023, the ceramic coating operations, covered under PTI 05-14377, the facility-wide OC emissions will be 94.0 tons. The facility-wide OC emissions from liquid organic cleanup is 13.00 tons of OC per year. After taking the fugitive emission away from the total allowable, the overall stacked OC allowable emission from the emissions units covered under this PTI is 13.0 tons per year, while the ceramic coating operations are limited to 68.0 tons per year, which will maintain this facility's combined OC emissions below the Title V threshold.

C. Source Emissions

This PTI will cover modifications in 10 existing emission units. The modifications include an increase in the OC content of the inks being employed in emissions units R017-R021, the silver coating operations, and process changes in the emissions units R013, R014, R024, and R025, the PVC encapsulation operations. Since two of the encapsulation lines were actually installed after August 3, 2006, and the other two were slightly modified after August 3, 2006, and since the individual potential OC emissions are below 10 tons per year, emissions units R013, R014, R024, and R025 are exempt from the requirements under OAC rule 3745-31-05(A)(3) by Ohio Senate Bill 265. The voluntary limits on emissions units R013, R014, R024, and R025 will be based on OAC rule 3745-31-03(C). Through the use of voluntary limitations on the encapsulation lines and BAT limitations on both the silver and ceramic emissions units, the OC emissions from this facility will be minimized and maintained below the applicable thresholds for as a Title V facility. These requirements will maintain this facility as a Synthetic Minor.

The 10 emissions unit covered under this PTI include:

1. R013, BE2 PVC Encapsulation Line, Coating Operation. This emissions unit was initially covered under PTI 05-14377, which required this emissions unit to comply with the requirement of OAC rule 3745-31-05(A)(3). The annual potential OC emissions from this emissions unit is 2.93 tons per. The actual installation date of this emissions unit was after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials to assure compliance.

2. R014, BE4 PVC Encapsulation Line, Coating Operation. This emissions unit was initially covered under PTI 05-14377, which required this emissions unit to comply with the requirement of OAC rule 3745-31-05(A)(3). The annual potential OC emissions from this emissions unit is 2.93 tons per. This emission unit has yet to be installed. Since the installation will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials to assure compliance.

3. R017, B83 Silver, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI 05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating

operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

4. R018, B84 Silver, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI 05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

5. R019, BT-3 Silver 1, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI 05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

6. R020, BT-3 Silver 2, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI 05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

7. R021, BTP-5 Silver, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI

05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

8. R022, BT-1 Silver, Coating Operation. This emissions unit was initially covered under PTI 05-14377. In PTI 05-14377 the allowable hourly OC emissions rates from this emission unit was determined to be 0.44 lbs/hr. Due to customer demands, the maximum OC content needed to produce the required products has increased from 6.75 lbs per gallon, as applied, to a monthly volume weighted average content of 8.65 lbs/gallon, from combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, the silver coating operations. The potential hourly OC emissions from this emissions unit, due to the use on higher OC content coatings, will increase from 0.44 lbs to 0.69 lbs. The annual potential will increase from 1.93 tons of OC to 3.02 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials and that a rolling 12-month combined OC emission limitation from the combined silver coating operations to not exceed 5.0 tons. This voluntary limitations will to assure compliance with the limits under OAC rule 3745-21-07(G)(2) and maintain this facility's overall OC and HAP(s) emissions below federally thresholds for Title V applicability.

9. R024, TP-8 PVC Encapsulation Line. This emissions unit was initially covered under PTI 05-14175, which required this emissions unit to comply with the requirement of OAC rule 3745-31-05(A)(3). Since then, due to production demands, the facility has requested a slight increase in the potential allowable from this emissions unit. The annual increase in the potential OC emissions from this emissions unit will increase from 1.8 tons to 2.93 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials to assure compliance.

10. R025, TP-5 PVC Encapsulation Line. This emissions unit was initially covered under PTI 05-14175, which required this emissions unit to comply with the requirement of OAC rule 3745-31-05(A)(3). Since then, due to production demands, the facility has requested a slight increase in the potential allowable from this emissions unit. The annual increase in the potential OC emissions from this emissions unit will increase from 1.8 tons to 2.93 tons. Since this modification will occur after August 3, 2006, and since the potential emissions are below 10 tons per year, Ohio Senate Bill 265 exempts this emissions units from the requirements of OAC rule 3745-31-05(A)(3). Since the potential hourly and daily OC emissions are below the requirements of OAC rule 3745-21-07(G)(2), no record keeping, reporting, or testing requirements will be needed to assure compliance. The company has also requested to be limited to only non-photochemically reactive cleanup materials to assure compliance.

In all these installations will not trigger Federal requirement and will assure this facility maintains enforceable limits to assure compliance.

D. Conclusion

AGC-Automotive's has requested to be permitted with voluntary 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 a rolling combined 12-month emission

limitations and hourly potential stackable OC emissions of 0.69 pounds. Based on the Allowable OC emission rates within this and the ceramic coating operation in PTI 05-14377, the Overall Facility OC emissions will be 94.0 tons. This PTI, as well as, PTI 05-14377, 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: 05-14410

Fac ID: 0546000103

DATE: 6/19/2007

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, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2300** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

SWDO

IN

LOGAN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL
05-14410 FOR AN AIR CONTAMINANT SOURCE FOR **AGC Automotive**

On 6/19/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **AGC Automotive**, located at **1465 W Sandusky Ave, Bellefontaine**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14410:

Modification of the silver coating tables and encapsulation lines.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-14410

Application Number: 05-14410
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):
Modification of the silver coating tables and encapsulation lines.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

AGC Automotive

PTI Application: 05-14410

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0546000103

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

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of any transfer of this permit.

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AGC Automotive**Facility ID: 0546000103****PTI Application: 05-14410****Issued: To be entered upon final issuance****4. Authorization To Install or Modify**

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

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC (Stacked)	13.0
OC (Fugitive)*	13.0
OC (Overall)	26.0
HAP	9.0
HAP(s)	24.0

* Includes combined cleanup of all emissions units at this facility.

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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 Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall organic compound (OC) emissions from the use of coating and adhesive materials employed in emissions units R013, R014, R024, and R025, shall not exceed 8.0 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>See Section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The total OC emissions shall not exceed 8 lbs/hr nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the adhesive operation of this emissions unit is 0.67 pounds. This potential is based on the maximum amount of adhesives employed in this emissions unit will not exceed 0.1 gallon per hour. The 0.1 gallon per hour is the maximum amount of adhesive that can be

Emissions Unit ID: R013

employed and still produce the desired product. The potential adhesive hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

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, R007, 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 organic compounds emitted from the coatings and adhesives employed in emission units R013, R014, R024, and R025 shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of all coatings and adhesives employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 8.0 tons/ rolling 12-month period</u>
1	0.8
1-2	1.6
1-3	2.4
1-4	3.0

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1-5	3.6
1-6	4.3
1-7	5.0
1-8	5.7
1-9	6.4
1-10	7.1
1-11	8.0
1-12	8.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual organic compound emission limitation shall be based upon a rolling, 12-month summation of the coatings and adhesives employed.

C. Monitoring and/or Recordkeeping Requirements

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

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
3. 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, R007, 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.

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4. 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: Trimethpentanediol Monoisobutyrate

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m³): 4,476.2

Estimated In-Stack Concentration (ug/m³): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 8.34

5. 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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable organic compound emission limitation in Section A.1., the permittee shall maintain the following records on all coatings and adhesives employed in emission units R013, R014, R024, and R025:
 - a. the name of the coating or adhesive employed;
 - b. the amount of each coating or adhesive employed, in gallons;
 - c. the organic compound content of each coating or adhesive employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating or adhesive, in tons of OC emitted per month ($(\text{"b"} \times \text{"c"})/2000$);
 - e. the total OC emitted per rolling 12-month period from all coatings or adhesives, in tons per month (the summation of "d" for all coating or adhesive employed); and

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- f. the cumulative total amount of OC emitted from all coatings or adhesives, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new adhesive, shall evaluate the maximum amount of adhesive and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of adhesive that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the adhesive that can be employed; and
- c. the maximum potential OC emissions from the use of adhesives.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of adhesives to exceed 0.67 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the combined OC emissions from the coatings or adhesives employed in emissions units exceeded 8.0 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

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- 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.
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC emitted from emissions units R013, R014, R024, and R025 exceeded the specified allowable.
2. 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:**

Combined OC emissions from emissions units R013, R014, R024, and R025 of 8.0 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitations in term A.2.b shall be determined by the record keeping in Section C.1.e. of these T&C's.

- b. **Emission Limitation:**

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R014) - BE-04 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall organic compound (OC) emissions from the use of coating and adhesive materials employed in emissions units R013, R014, R024, and R025, shall not exceed 8.0 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>See Section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The total OC emissions shall not exceed 8 lbs/hr nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the adhesive operation of this emissions unit is 0.67 pounds. This potential is based on the maximum amount of adhesives employed in this emissions unit will not exceed 0.1 gallon per hour. The 0.1 gallon per hour is the maximum amount of adhesive that can be employed and still produce the desired product. The potential adhesive hourly

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OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

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, R007, 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 organic compounds emitted from the coatings and adhesives employed in emission units R013, R014, R024, and R025 shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of all coatings and adhesives employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 8.0 tons/ rolling 12-month period</u>
1	0.8
1-2	1.6
1-3	2.4
1-4	3.0
1-5	3.6

1-6	4.3
1-7	5.0
1-8	5.7
1-9	6.4
1-10	7.1
1-11	8.0
1-12	8.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual organic compound emission limitation shall be based upon a rolling, 12-month summation of the coatings and adhesives employed.

C. Monitoring and/or Recordkeeping Requirements

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

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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;

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- 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.
3. 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, R007, 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.
4. The permit to install for this emissions unit was evaluated based on the actual materials

Emissions Unit ID: **R014**

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: Trimethpentanediol Monoisobutyrate

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m³): 4,476.2

Estimated In-Stack Concentration (ug/m³): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 8.34

5. 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: **R014**

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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable organic compound emission limitation in Section A.1., the permittee shall maintain the following records on all coatings and adhesives employed in emission units R013, R014, R024, and R025:
 - a. the name of the coating or adhesive employed;
 - b. the amount of each coating or adhesive employed, in gallons;
 - c. the organic compound content of each coating or adhesive employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating or adhesive, in tons of OC emitted per month ($(\text{"b"} \times \text{"c"})/2000$);
 - e. the total OC emitted per rolling 12-month period from all coatings or adhesives, in tons per month (the summation of "d" for all coating or adhesive employed); and
 - f. the cumulative total amount of OC emitted from all coatings or adhesives, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new adhesive, shall evaluate the maximum amount of adhesive and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of adhesive that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the adhesive that can be employed; and
- c. the maximum potential OC emissions from the use of adhesives.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of adhesives to exceed 0.67 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the combined OC emissions from the coatings or adhesives employed in emissions units exceeded 8.0 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

Emissions Unit ID: **R014**

facility exceeded 24.0 tons per year, based on a 12-month rolling average.

- e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC emitted from emissions units R013, R014, R024, and R025 exceeded the specified allowable.
2. 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:

Combined OC emissions from emissions units R013, R014, R024, and R025 of 8.0 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitations in term A.2.b shall be determined by the record keeping in Section C.1.e. of these T&C's.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R017) - B-83 Silver line (the terms and conditions of this permit will supercede the requirements in PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount of coatings and inks employed in this emissions unit will not exceed 0.08 gallon

Emissions Unit ID: **R017**

per hour. The 0.08 gallon per hour is the maximum amount of coating that can be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5
1-2	1.0
1-3	1.5

1-4	2.0
1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

2. The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").
2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
3. 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, R007, 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.
4. 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

Emissions Unit ID: **R017**

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: Toluene

TLV (mg/m³): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m³): 8,928.57

Estimated In-Stack Concentration (ug/m³): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 19.08

5. 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

Emissions Unit ID: **R017**

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.

6. 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.
7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the maximum amount of inks and coatings and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.
2. 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

Emissions Unit ID: **R017**

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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

- c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R018) - B-84 Silver line (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount of coatings and inks employed in this emissions unit will not exceed 0.08 gallon per hour. The 0.08 gallon per hour is the maximum amount of coating that can

Emissions Unit ID: **R018**

be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5
1-2	1.0
1-3	1.5
1-4	2.0

1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

- 2 The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").
2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
- 3.** 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, R007, 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.
- 4.** 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

Emissions Unit ID: **R018**

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: Toluene

TLV (mg/m³): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m³): 8,928.57

Estimated In-Stack Concentration (ug/m³): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 19.08

5. 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

Emissions Unit ID: **R018**

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.

6. 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.
7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the maximum amount of inks and coatings and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.
2. 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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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

Emissions Unit ID: **R018**

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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R019) - BT-3 Silver Table 1 (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount

Emissions Unit ID: **R019**

of coatings and inks employed in this emissions unit will not exceed 0.08 gallon per hour. The 0.08 gallon per hour is the maximum amount of coating that can be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5

1-2	1.0
1-3	1.5
1-4	2.0
1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

2. The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.

3. 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, R007, 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.

Emissions Unit ID: **R019**

4. 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: Toluene

TLV (mg/m³): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m³): 8,928.57

Estimated In-Stack Concentration (ug/m³): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 19.08

5. 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.).

Emissions Unit ID: **R019**

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.

6. 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.
7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the

maximum amount of inks and coatings and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.

Emissions Unit ID: **R019**

2. 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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R020) - BT-3 Silver Table 2 (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount

Emissions Unit ID: **R020**

of coatings and inks employed in this emissions unit will not exceed 0.08 gallon per hour. The 0.08 gallon per hour is the maximum amount of coating that can be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5
1-2	1.0

1-3	1.5
1-4	2.0
1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

2. The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").

Emissions Unit ID: **R020**

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.

3. 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, R007, 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.

Emissions Unit ID: **R020**

4. 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: Toluene

TLV (mg/m³): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m³): 8,928.57

Estimated In-Stack Concentration (ug/m³): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 19.08

5. 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.).

Emissions Unit ID: **R020**

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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the

Emissions Unit ID: **R020**

maximum amount of inks and coatings and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.

Emissions Unit ID: **R020**

2. 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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

- c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions

Emissions Unit ID: **R020**

from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R021) - BTP-05 Silver Table (the terms and conditions of this permit will supercede the requirements in PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount

Emissions Unit ID: **R021**

of coatings and inks employed in this emissions unit will not exceed 0.08 gallon per hour. The 0.08 gallon per hour is the maximum amount of coating that can be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5
1-2	1.0

1-3	1.5
1-4	2.0
1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

2. The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").
2. The permittee shall collect and record the following information each month on the

Emissions Unit ID: **R021**

cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
3. 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, R007, 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.
4. The permit to install for this emissions unit was evaluated based on the actual materials

Emissions Unit ID: **R021**

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: Toluene

TLV (mg/m³): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m³): 8,928.57

Estimated In-Stack Concentration (ug/m³): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 19.08

5. 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: **R021**

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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the maximum amount of inks and coatings and potential emissions increase that will be

required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.
2. 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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020,

Emissions Unit ID: **R021**

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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 line (the terms and condition of this permit will superceded the requirements of PTI 05-14377)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall OC emissions from the use of cleanup materials in emissions units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>See section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the screen printing operation of this emissions unit is 0.69 pounds. This potential is based on the maximum amount

Emissions Unit ID: **R022**

of coatings and inks employed in this emissions unit will not exceed 0.08 gallon per hour. The 0.08 gallon per hour is the maximum amount of coating that can be employed and still produce the desired product. The potential printing hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 5.0 tons/ rolling 12-month period</u>
1	0.5
1-2	1.0

1-3	1.5
1-4	2.0
1-5	2.5
1-6	2.9
1-7	3.3
1-8	3.7
1-9	4.1
1-10	4.5
1-11	5.0
1-12	5.0

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

2. The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
3. The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.

C. Monitoring and/or Recordkeeping Requirements

1. 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c");
 - e. the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - f. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - g. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").
2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, R008,

Emissions Unit ID: **R022**

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.
3. 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, R007, 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.
4. 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

Emissions Unit ID: **R022**

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: Toluene

TLV (mg/m3): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m3): 8,928.57

Estimated In-Stack Concentration (ug/m3): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m3): 19.08

5. 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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable coating organic compound usage rates of Section B.1., the permittee shall maintain the following 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 each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compounds employed from each coating, in lbs of OC employed per month ("b" x "c");
 - e. the total OC employed per month from all coatings, in tons per month (the summation of "d" for all coatings employed divided by 2000 lbs/ton);
 - f. the cumulative total amount of OC employed from all coatings, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new printing pattern, shall evaluate the maximum amount of inks and coatings and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of inks and coatings that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the inks and coatings that can be employed; and
- c. the maximum potential OC emissions from the use of inks and coatings.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of inks and coatings to exceed 0.69 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the total OC's employed in emissions 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;
 - 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; and
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC's employed in emissions units R017, R018, R019, R020, R021, and R022 exceeded the specified allowable.
2. 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:

5.00 tons per 12-month rolling period OC, from all coatings employed in emissions units R017, R018, R019, R020, R021, and R022.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.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, and inks employed.

b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020,

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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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R024) - TP-8 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14175)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall organic compound (OC) emissions from the use of coating and adhesive materials employed in emissions units R013, R014, R024, and R025, shall not exceed 8.0 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>See Section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The total OC emissions shall not exceed 8 lbs/hr nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the adhesive operation of this emissions unit is 0.67 pounds. This potential is based on the maximum amount of adhesives employed in this emissions unit will not exceed 0.1 gallon per hour. The 0.1 gallon per hour is the maximum amount of adhesive that can be

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employed and still produce the desired product. The potential adhesive hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings and adhesives employed in emission units R013, R014, R024, and R025 shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of all coatings and adhesives employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 8.0 tons/ rolling 12-month period</u>
1	0.8
1-2	1.6
1-3	2.4
1-4	3.0

1-5	3.6
1-6	4.3
1-7	5.0
1-8	5.7
1-9	6.4
1-10	7.1
1-11	8.0
1-12	8.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual organic compound emission limitation shall be based upon a rolling, 12-month summation of the coatings and adhesives employed.

C. Monitoring and/or Recordkeeping Requirements

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

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
3. 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, R007, 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.

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4. 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: Trimethpentanediol Monoisobutyrate

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m³): 4,476.2

Estimated In-Stack Concentration (ug/m³): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 8.34

5. 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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable organic compound emission limitation in Section A.1., the permittee shall maintain the following records on all coatings and adhesives employed in emission units R013, R014, R024, and R025:
 - a. the name of the coating or adhesive employed;
 - b. the amount of each coating or adhesive employed, in gallons;
 - c. the organic compound content of each coating or adhesive employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating or adhesive, in tons of OC emitted per month ($(\text{"b"} \times \text{"c"})/2000$);
 - e. the total OC emitted per rolling 12-month period from all coatings or adhesives, in tons per month (the summation of "d" for all coating or adhesive employed); and

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- f. the cumulative total amount of OC emitted from all coatings or adhesives, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new adhesive, shall evaluate the maximum amount of adhesive and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of adhesive that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the adhesive that can be employed; and
- c. the maximum potential OC emissions from the use of adhesives.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of adhesives to exceed 0.67 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the combined OC emissions from the coatings or adhesives employed in emissions units exceeded 8.0 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.
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC emitted from emissions units R013, R014, R024, and R025 exceeded the specified allowable.
2. 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:

Combined OC emissions from emissions units R013, R014, R024, and R025 of 8.0 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitations in term A.2.b shall be determined by the record keeping in Section C.1.e. of these T&C's.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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 cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., 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 - (R025) - BE-03 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14175)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	<p>The combined overall organic compound (OC) emissions from the use of coating and adhesive materials employed in emissions units R013, R014, R024, and R025, shall not exceed 8.0 tons per rolling 12 month period.</p> <p>The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.</p> <p>See Section A.2.b.</p>
OAC Rule 3745-21-07(G)(2)	The total OC emissions shall not exceed 8 lbs/hr nor 40 lb/day, whenever Photochemically Reactive (PRM) are employed in this emission unit.
OAC rule 3745-114-01 and ORC 3704.03(F)	Ohio Toxics Policy

2. Additional Terms and Conditions

- 2.a The potential hourly OC emission from the adhesive operation of this emissions unit is 0.67 pounds. This potential is based on the maximum amount of adhesives employed in this emissions unit will not exceed 0.1 gallon per hour. The 0.1 gallon per hour is the maximum amount of adhesive that can be

Emissions Unit ID: **R025**

employed and still produce the desired product. The potential adhesive hourly OC emissions along with the voluntary use of non-photochemically reactive cleanup material, will maintain the OC emissions from this emissions unit to not exceed limitations of OAC rule 3745-21-07(G)(2). Since the established potentials will not exceed the specific limitations within OAC rule 3745-21-07(G)(2), it is not necessary to establish daily record keeping and reporting requirements. However, in order to assure future modifications do not cause and increase in the potential hourly emissions and possible exceedances of OAC rule 3745-21-07(G)(2), this facility will have to comply with the monitoring and record keeping requirements of Sections C.8.

- 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, R007, 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 organic compounds emitted from the coatings and adhesives employed in emission units R013, R014, R024, and R025 shall not exceed 8.0 tons per year, based upon a rolling, 12-month summation of all coatings and adhesives employed in these emission units.

To ensure enforceability during 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 Organic Compounds of 8.0 tons/ rolling 12-month period</u>
1	0.8
1-2	1.6
1-3	2.4
1-4	3.0

Emissions Unit ID: **R025**

1-5	3.6
1-6	4.3
1-7	5.0
1-8	5.7
1-9	6.4
1-10	7.1
1-11	8.0
1-12	8.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual organic compound emission limitation shall be based upon a rolling, 12-month summation of the coatings and adhesives employed.

C. Monitoring and/or Recordkeeping Requirements

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

2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, 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.
3. 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, R007, 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.

Emissions Unit ID: **R025**

4. 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: Trimethpentanediol Monoisobutyrate

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m³): 4,476.2

Estimated In-Stack Concentration (ug/m³): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m³): 8.34

5. 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.

6. 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.

7. To ensure enforceability and compliance during the first 12 calendar months following the issuance of this permit with the allowable organic compound emission limitation in Section A.1., the permittee shall maintain the following records on all coatings and adhesives employed in emission units R013, R014, R024, and R025:
 - a. the name of the coating or adhesive employed;
 - b. the amount of each coating or adhesive employed, in gallons;
 - c. the organic compound content of each coating or adhesive employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating or adhesive, in tons of OC emitted per month ($(\text{"b"} \times \text{"c"})/2000$);
 - e. the total OC emitted per rolling 12-month period from all coatings or adhesives, in tons per month (the summation of "d" for all coating or adhesive employed); and

Emissions Unit ID: **R025**

- f. the cumulative total amount of OC emitted from all coatings or adhesives, in tons for each time period as specified in Section B.1. of this permit.

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

8. This facility shall, prior to initially employing a new adhesive, shall evaluate the maximum amount of adhesive and potential emissions increase that will be required in order to produce the desired product.

This evaluation shall include the following information:

- a. the maximum amount of adhesive that can be employed, in gallons per hour;
- b. the maximum organic compound (OC) content of the adhesive that can be employed; and
- c. the maximum potential OC emissions from the use of adhesives.

These evaluations shall be maintained in the company files and be made available upon request during operational hours.

Prior, to initially employing a new printing pattern that would cause an increase of the potential OC emissions from the use of adhesives to exceed 0.67 pounds per hour, the permittee shall submit and obtain permit modifications as required by OAC rules 3745-31-02 and 3745-35-02, respectively.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each 12-month period during which the combined OC emissions from the coatings or adhesives employed in emissions units exceeded 8.0 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.
 - e. during the first 12 calendar months following the issuance of this permit, an identification of each cumulative total period, as specified in Section B.1. of this permit, during which the total OC emitted from emissions units R013, R014, R024, and R025 exceeded the specified allowable.
2. 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:

Combined OC emissions from emissions units R013, R014, R024, and R025 of 8.0 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitations in term A.2.b shall be determined by the record keeping in Section C.1.e. of these T&C's.

- b. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections 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: **R025**

the organic compound contents of the cleanup materials employed.

c. Emission Limitation:

The combined overall single HAP and/or any combination of HAPs emissions from emission units at this facility K006, K009, R001, R004, R005, R007, 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.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections C.3.e. and C.3.h, 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 materials employed.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., 7., D. and E.

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: R025

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R013

EMISSIONS UNIT DESCRIPTION BE-2 Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

DATE INSTALLED 9/06

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.69 lbs/hr	3.02 tons/yr 8.0 T/12-mths*	0.69 lbs/hr	3.02 tons/yr 8.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from encapsulation operation.

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: **R025**SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R014EMISSIONS UNIT DESCRIPTION BE-04 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)DATE INSTALLED not yet installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.69 lbs/hr	3.02 tons/yr 8.0T/12-mths*	0.69lbs/hr	3.02 tons/yr 8.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from encapsulation operations.

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yesOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: R025

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R017

EMISSIONS UNIT DESCRIPTION B-83 Silver line (the terms and conditions of this permit will supercede the requirements in PTI 05-14377)

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: **R025**

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R018

EMISSIONS UNIT DESCRIPTION B-84 Silver line (the terms and conditions of this permit will superceded the requirements of PTI 05-14377)

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
 Enter Determination _____

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: R025

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R019

EMISSIONS UNIT DESCRIPTION BT-3 Silver Table 1 (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: **R025**SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R020EMISSIONS UNIT DESCRIPTION BT-3 Silver Table 2 (the terms and conditions of this permit will supercede the requirements of PTI 05-14377)

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination _____

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yesOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NE
P1
FA

Emissions Unit ID: **R025**

FACILITY DESCRIPTION Modification of the silver coating
tables and encapsulation lines

CITY/TWP Bellefontaine

SIC CODE **3231** SCC CODE **04-02-999-98** EMISSIONS UNIT ID **R021**

EMISSIONS UNIT DESCRIPTION **BTP-05 Silver Table (the terms and conditions of this permit will
superceded the requirements in PTI 05-14377)**

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: R025

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R022

EMISSIONS UNIT DESCRIPTION BT-01 Silver line (the terms and condition of this permit will superceded the requirements of PTI 05-14377)

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*	0.67 lbs/hr	2.93 tons/yr 5.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from silver coating operations

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: R025

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R024

EMISSIONS UNIT DESCRIPTION TP-8 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14175)

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.69 lbs/hr	3.02 tons/yr 8.0 T/12-mths*	0.69 lbs/hr	3.02 tons/yr 8.0 tons/12-mth*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from encapsulation operations

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)

1 NEW SOURCE REVIEW FORM B

PTI Number: 05-14410 Facility ID: 0546000103

FACILITY NAME AGC Automotive

FACILITY DESCRIPTION Modification of the silver coating CITY/TWP Bellefontaine

Emissions Unit ID: **R025**

SIC CODE 3231 SCC CODE 04-02-999-98 EMISSIONS UNIT ID R025

EMISSIONS UNIT DESCRIPTION BE-03 PVC Encapsulation Line (the terms and conditions of this permit will supercede the requirements of PTI 05-14175)

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment				
PM ₁₀	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment	0.69 lbs/hr	3.02 tons/yr 8.0 T/12-mths*	0.69 lbs/hr	3.02 tons/yr 8.0 T/12-mths*
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

* combined OC emissions from encapsulation operations

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: CO, PRM, and HAP(s)