



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 05-14410**

**Fac ID: 0546000103**

**DATE: 8/9/2007**

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

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

CC: USEPA

SWDO



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 8/9/2007  
Effective Date: 8/9/2007**

---

**FINAL PERMIT TO INSTALL 05-14410**

Application Number: 05-14410  
Facility ID: 0546000103  
Permit Fee: **\$2300**  
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: 8/9/2007**

**Facility ID: 0546000103**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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. Records Retention Requirements**

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

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

**AGC Automotive**  
**PTI Application: 05-14410**  
**Issued: 8/9/2007**

**Facility ID: 0546000103**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

**AGC Automotive**  
**PTI Application: 05-14410**  
**Issued: 8/9/2007**

**Facility ID: 0546000103**

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

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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

**AGC Automotive**  
**PTI Application: 05-14410**  
**Issued: 8/9/2007**

**Facility ID: 0546000103**

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

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

7

**AGC Automotive**  
**PTI Application: 05-14410**  
**Issued: 8/9/2007**

**Facility ID: 0546000103**

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

Issued: 8/9/2007

**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.

**Issued: 8/9/2007**

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 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;

**Issued: 8/9/2007**

- 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.

**Issued: 8/9/2007**

\*\* 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 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/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m<sup>3</sup>): 4,476.2

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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

Emissions Unit ID: R013

- 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 ( $(\text{"b"} \times \text{"c"})/2000$ );

**Issued: 8/9/2007**

- 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;

Emissions Unit ID: R013

- 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:

**Issued: 8/9/2007**

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 - (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	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.  The liquid organic cleanup material employed in this emissions unit shall be non-photochemically reactive.  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.  See Section A.2.b.
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

Emissions Unit ID: R014

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

- 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

**Issued: 8/9/2007**

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;

Emissions Unit ID: R014

- 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.

**Issued: 8/9/2007**

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/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m<sup>3</sup>): 4,476.2

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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

Emissions Unit ID: R014

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

**Issued: 8/9/2007**

- 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;

Emissions Unit ID: **R014**

- 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.

**Issued: 8/9/2007**

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.

Issued: 8/9/2007

**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 ID: R017

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 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

**Issued: 8/9/2007**

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: **R017**

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.

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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 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.

**Issued: 8/9/2007**

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,

Emissions Unit ID: R017

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.

**Issued: 8/9/2007**

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.

Emissions Unit ID: R018

**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

**Issued: 8/9/2007**

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

Emissions Unit ID: **R018**

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,

**Issued: 8/9/2007**

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.

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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: R018

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

**Issued: 8/9/2007**

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,

Emissions Unit ID: **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.

**Issued: 8/9/2007**

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.

Emissions Unit ID: R019

**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

**Issued: 8/9/2007**

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>
-----------------	--

**AGC Automotive**

**DTI Application: 05 11110**

**Facility ID:**

**0546000103**

Emissions Unit ID: **R019**

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

**Issued: 8/9/2007**

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;

**Issued: 8/9/2007**

- 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 of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under

Emissions Unit ID: **R019**

OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

Issued: 8/9/2007

**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.

**Issued: 8/9/2007**

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.

Emissions Unit ID: R020

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

- 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**

- 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

**Issued: 8/9/2007**

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>
-----------------	--

**AGC Automotive**

**DTI Application: 05 11110**

**Facility ID:**

**0546000103**

Emissions Unit ID: **R020**

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

**Issued: 8/9/2007**

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;

**Issued: 8/9/2007**

- 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 of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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

Emissions Unit ID: **R020**

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.

Emissions Unit ID: **R020**

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

**Issued: 8/9/2007**

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.

**Issued: 8/9/2007**

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.

Emissions Unit ID: R021

**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

**Issued: 8/9/2007**

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>
-----------------	--

**AGC Automotive**

**DTI Application: 05 11110**

**Facility ID:**

**0546000103**

Emissions Unit ID: **R021**

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

**Issued: 8/9/2007**

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;

**Issued: 8/9/2007**

- 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 of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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

Emissions Unit ID: **R021**

OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

Emissions Unit ID: **R021**

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.

Issued: 8/9/2007

**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.

**Issued: 8/9/2007**

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 - (R022) - BT-01 Silver line (the terms and condition 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

**Issued: 8/9/2007**

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>
-----------------	--

**AGC Automotive**

**DTI Application: 05 11110**

**Facility ID:**

**0546000103**

**Emissions Unit ID: R022**

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

**Issued: 8/9/2007**

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;

Issued: 8/9/2007

- 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 of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted

**Issued: 8/9/2007**

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/m<sup>3</sup>): 375

Maximum Hourly Emission Rate (lbs/hr): 1.48

MAGLC (ug/m<sup>3</sup>): 8,928.57

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 53,894.3

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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

Emissions Unit ID: **R022**

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.

Emissions Unit ID: **R022**

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

**Issued: 8/9/2007**

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.

**Issued: 8/9/2007**

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.

Emissions Unit ID: R024

**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

**Issued: 8/9/2007**

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

Emissions Unit ID: **R024**

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;

**Issued: 8/9/2007**

- 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

**Issued: 8/9/2007**

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 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/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m<sup>3</sup>): 4,476.2

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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;

Emissions Unit ID: **R024**

- 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;

**Issued: 8/9/2007**

- 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 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.

**Issued: 8/9/2007**

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**

**Issued: 8/9/2007**

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

Emissions Unit ID: R025

**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

**Issued: 8/9/2007**

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

**Issued: 8/9/2007**

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;

Emissions Unit ID: R025

- 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

**Issued: 8/9/2007**

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 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/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 0.65

MAGLC (ug/m<sup>3</sup>): 4,476.2

Estimated In-Stack Concentration (ug/m<sup>3</sup>): 23,571.5

Screen 3 predicted Highest Ground Level Concentration (ug/m<sup>3</sup>): 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;

Emissions Unit ID: **R025**

- 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;

**Issued: 8/9/2007**

- 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 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.

**Issued: 8/9/2007**

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**

**Issued: 8/9/2007**

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