



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
SHELBY COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

**Application No: 05-13593
Fac ID: 0575000095**

DATE: 4/19/2005

Airstream Inc
Terry Coleman
419 W Pike St
Jackson Center, OH 45334

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

SWDO

IN



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-13593

Application Number: 05-13593
Facility ID: 0575000095
Permit Fee: **To be entered upon final issuance**
Name of Facility: Airstream Inc
Person to Contact: Terry Coleman
Address: 419 W Pike St
Jackson Center, OH 45334

Location of proposed air contaminant source(s) [emissions unit(s)]:
**419 W Pike St
Jackson Center, Ohio**

Description of proposed emissions unit(s):
Installation of a new motor home manufacturing and assembly facility.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Airstream Inc

Facility ID: 0575000095

PTI Application: 05-13593

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Record keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

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be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	37.4
PE	3.83
Total HAP	5.98

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K101 - Glue Application - Motor Homes	OAC rule 3745-31-05(A)	<p>Volatile organic compounds (VOC) emissions shall not exceed 10.77 lbs per hour.</p> <p>VOC content of adhesives shall not exceed 5.02 lbs per gallon.</p> <p>VOC content of cleanup materials shall not exceed 6.76 lbs per gallon</p> <p>See A.2.a., below.</p>
	OAC rule 3745-21-07(G)	See A.2.c., below.
	OAC rule 3745-17-11(A)(2)	<p>Particulate Emissions (PE) shall not exceed 0.551 pound per hour, and 0.6 ton per year.</p> <p>See A.2.b., below.</p>
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation for VOC is based upon the emissions unit's potential to emit (PTE). Therefore, there are no record keeping, reporting or testing requirements associated with this limit. Compliance with the requirements for Best Available Technology also include compliance with OAC rule 3745-17-11(A)(2), and OAC rule

3745-17-07(A).

- 2.b** The PE limitations are derived from Table I, OAC rule 3745-17-11. Figure II was determined to be not applicable per OAC rule 3745-17-11(A)(2)(a)(i) because the uncontrolled mass rate of emissions could not be determined.
- 2.c** The liquid organic materials or substances containing liquid organic material used in this emissions unit are not baked, heat-cured, or heat-polymerized, and do not come into contact with flame. As such, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(1). Furthermore, the adhesives employed in this emissions unit shall not photochemically reactive material (per the definition in OAC rule 3745-21-01(C)(5)). Therefore, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(2).

II. Operational Restrictions

- 1.** The permittee shall not employ materials in this emissions unit that meet the definition of "Photochemically Reactive Material" as defined in OAC rule 3745-21-01(C)(5).
- 2.** The adhesive applied shall not cause VOC emissions to exceed 11.85 tons per rolling, 12-month period, including emissions from cleanup materials. VOC emissions shall be calculated according to the following formula:

$$\text{Applicable VOC Emission limit, in tons (see below)} \geq \frac{\sum_{i=1}^n (VA_i)(GA_i) + \sum_{j=1}^n (VC_j)(GC_j)}{2000 \text{ lbs/Ton}}$$

where:

VA_i = VOC content in pounds per gallon of adhesive *i*, subject to the following limitation:

VC_i ≤ 5.02 lbs VOC/gallon;

GA_i = Gallons used of adhesive *i* for the 12-month period;

VC_j = VOC content in pounds per gallon of cleanup material *j*, subject to the following limitation:

VC_i ≤ 6.76 lbs VOC/gallon;

GC_j = Gallons used of cleanup material *j* for the 12-month period;

n = Total number of unique adhesives and unique cleanup materials employed during the 12-month period.

To ensure enforceability during the first 12 calendar months of operation of K101, the permittee shall not exceed the VOC Emission limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions</u>
1	0.98 tons

1-2	1.97
1-3	2.96
1-4	3.95
1-5	4.93
1-6	5.92
1-7	6.91
1-8	7.90
1-9	8.88
1-10	9.87
1-11	10.86
1-12	11.85

After the first 12 calendar months of operation of K101, compliance with the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the VOC emission figures.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. The name and identification number of each adhesive employed in this emissions unit;
 - b. The VOC content of each adhesive employed in this emissions unit, in pounds per gallon;
 - c. The volume, in gallons, of each adhesive employed in this emissions unit;
 - d. The name and identification number of each cleanup material employed in this emissions unit;
 - e. The VOC content of each cleanup material employed in this emissions unit, in pounds per gallon;
 - f. The volume, in gallons, of each cleanup material employed in this emissions unit;
 - g. The VOC emissions from adhesive application, in tons;
 - h. The VOC emissions from cleanup material usage; and
 - i. The rolling 12-month summation of VOC emissions from both adhesives and cleanup materials employed in this emissions unit.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following limitations or usage restrictions:
 - a. The VOC content limitation for adhesives of 5.02 lbs VOC per gallon;
 - b. The VOC content limitation for cleanup materials of 6.76 lbs VOC per gallon;
 - c. The accumulative VOC emission limitations during the first twelve months of operation; and
 - d. The VOC emission limitation of 11.85 tons per rolling 12-month period, after the first twelve months of operation.

The quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days after the event occurs.

V. Testing Requirements

1. Emission Limitations:
VOC content of adhesives shall not exceed 5.02 lbs per gallon.

VOC content of cleanup materials shall not exceed 6.76 lbs per gallon.

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section III.1 shall demonstrate the materials used complies with these VOC content limitations.

2. Emission Limitation:
VOC emissions shall not exceed the accumulative monthly emission limitations established in II.2.

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including emissions from cleanup materials.

VOC emissions shall not exceed 11.85 tons per rolling 12-month period, including emissions from cleanup materials.

Applicable Compliance Method:

The record keeping requirements of Part III shall demonstrate compliance with the VOC emission limitations.

3. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.551 pound per hour, and 0.6 ton per year.

Applicable compliance method:

If required, compliance shall be demonstrated using U.S. EPA Methods 1-5, as detailed 40 CFR Part 60, appendix A.

4. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable compliance method:

If required, U.S. EPA Method 9 shall be used to determine compliance with the visible PE limitation.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K101 - Glue Application	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit (K101) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methylene Chloride (dichloromethane)

TLV (mg/m³): 173 mg/m³

Maximum Hourly Emission Rate (g/sec): 0.47

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 549.6

MAGLC (ug/m³): 4,119

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

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

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

2. 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.

IV. Reporting Requirements

Airstream Inc
PTI Application: 05 12502
Issued

Facility ID: 0575000095

Emissions Unit ID: **K101**

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: **K102**

Issued: **To be entered upon final issuance**

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K102 - Black Chassis Paint Line - Motor Homes	OAC rule 3745-31-05(A)	OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-09(U)(1)(c)	
	OAC rule 3745-17-11(B)(1)	

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<u>Applicable Emissions Limitations/Control Measures</u>	average, except as provided by rule.
23.23 lbs VOC per hour	
3.44 lbs VOC/gallon of coating, excluding water and exempt solvents	
VOC content of cleanup materials shall not exceed 6.76 pounds per gallon.	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-17-11(B)(2), and 3745-17-07(A).	
See A.2.a. below.	
VOC emissions shall not exceed 25.55 tons per rolling 12-month period, including coatings and cleanup materials.	
The coating content required by this rule is less stringent than the content limitation established under OAC rule 3745-31-05.	
0.551 lb particulate emissions (PE)/hr and 0.6 tons per year PE	
See A.2.b below.	
Visible PE shall not exceed 20 % opacity, as a six-minute	

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2. Additional Terms and Conditions

- 2.a** The permittee shall employ only extreme performance coatings in this emission unit. This unit's hourly emission limit for VOC is based upon the unit's potential to Emit (PTE) for VOC. Therefore, there are no monitoring, record keeping or testing requirements associated with the hourly limit.
- 2.b** The PE per hour limitation was derived from "Table I" using a process weight rate of less than 0.05 ton per hour.

II. Operational Restrictions

- 1.** The maximum coatings usage for this emissions unit shall not exceed 13,750 gallons per rolling 12-month period, including water and exempt solvents.

To ensure enforceability during the first 12 calendar months of operation of K102, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1,145 gallons
1-2	2,291
1-3	3,437
1-4	4,583
1-5	5,729
1-6	6,875
1-7	8,020
1-8	9,166
1-9	10,312
1-10	11,458
1-11	12,604
1-12	13,750

After the first 12 calendar months of operation of K102, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

- 2.** The maximum cleanup materials usage for this emissions unit shall not exceed 550 gallons per rolling 12-month period.

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To ensure enforceability during the first 12 calendar months of operation of K102, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage</u>
1	45 gallons
1-2	91
1-3	137
1-4	183
1-5	229
1-6	275
1-7	320
1-8	366
1-9	412
1-10	458
1-11	504
1-12	550

After the first 12 calendar months of operation of K102, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and cleanup material employed.
 - b. The VOC content of each coating (in lbs/gallon, excluding water and exempt solvents), as applied.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating employed, excluding water and exempt solvents.

- e. The number of gallons of each cleanup material employed.
 - f. The total VOC emissions from all the coatings and cleanup materials employed, in pounds [summation of (b x d) for all coatings + summation of (c x e) for all cleanup materials].
 - g. The number of gallons of each coating employed, including water and exempt solvents.
 - h. The total coatings usage, in gallons, from all the coatings employed [summation of g for all coatings].
 - i. The total cleanup materials usage, in gallons, from all the cleanup materials employed [summation of e for all cleanup materials].
 - j. During the first 12 calendar months of operation, the permittee shall record the cumulative coating usage for each calendar month.
 - k. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the coating usage figures.
 - l. During the first 12 calendar months of operation, the permittee shall record the cumulative cleanup material usage for each calendar month.
 - m. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the cleanup material usage figures.
 - n. The combined rolling 12-month summation of VOC emissions from coatings and cleanup materials used in this emissions unit, in tons.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any record showing the use of noncomplying cleanup materials (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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- a. Exceedances of the rolling 12-month limit on coating usage of 13,750 gallons and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage levels; and
- b. Exceedances of the rolling 12-month limit on cleanup material usage of 550 gallons and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative cleanup material usage levels.

The quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

4. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days after the event occurs.

V. Testing Requirements

1. Emission Limitations:
3.44 lbs VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings)

VOC content of cleanup materials shall not exceed 6.76 pounds per gallon.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials employed in this emissions unit.

2. Emission Limitations:
VOC emissions shall not exceed 25.55 tons per rolling 12-month period, including coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the mass emission limitations shall be demonstrated through the record keeping requirements in Parts III.1 and III.2 of this permit. Worst case VOC emissions are calculated as follows:

$$\text{VOC Emissions} = \frac{[(\text{gallons of Coating})(\text{VOC content of coating}) + (\text{gallons of cleanup material})(\text{VOC content of cleanup material})]}{2000 \text{ lbs/ton}}$$

$$\frac{[(13,750 \text{ gal})(3.44 \text{ lbs VOC/gal}) + (550 \text{ gal})(6.76 \text{ lbs VOC/gal})]}{2000 \text{ lbs/ton}}$$

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$[(47,300 \text{ lbs VOC}) + (3,718 \text{ lbs VOC})] \div 2000 \text{ lbs/ton}$

25.55 tons VOC

- 3.** Emission Limitation:
0.551 lb particulate emissions (PE/hr)

Applicable Compliance Method:

If required, compliance shall be demonstrated using U.S. EPA Methods 1-5, as detailed 40 CFR Part 60, appendix A.

- 4.** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable compliance method:

If required, U.S. EPA Method 9 shall be used to determine compliance with the visible PE limitation.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K102 - Black Chassis Paint Line	OAC rule 3745-31-05	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit (K102) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl n-propyl ketone

TLV (mg/m³): 704 mg/m³

Maximum Hourly Emission Rate (g/sec): 0.502

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Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 492

MAGLC ($\mu\text{g}/\text{m}^3$): 16,760

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.

2. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
P101 - Wood Shop - Motor Homes	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-11	

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Applicable Emissions

Limitations/ControlMeasures

Visible Particulate Emissions (PE) shall not exceed 5 percent opacity as a six-minute average.

PE shall not exceed 0.6 lb per hour.

PE shall not exceed 2.63 tons per year.

See A.2.a., below.

The emission limitation specified by this rule is less stringent than the emission limitation established under OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE limitations are based upon the emission unit's potential to emit (0.6 lb PE/hour for 8,760 hours per year). Therefore, these limitations do not have associated record keeping and reporting requirements.

II. Operational Restrictions

- 1.** The permittee shall operate the baghouse collection and filtration system at all times this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

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1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. The location and color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Within ninety (90) days of commencing operation of this emission unit the permittee shall determine and report to the Director (the Ohio EPA, Southwest District Office) the appropriate, allowable range of pressure drop across the baghouse, in inches of water. The reported pressure drop range shall be used in evaluation of the permittee's compliance with term IV.2, below.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.
3. The permittee shall submit semiannual written reports that
 - (a) Identify all days during which any visible particulate emissions were observed from the baghouse associated with this emissions unit; and

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(b) Describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA, Southwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
PE shall not exceed 0.6 lb per hour.

Applicable Compliance Method:

The hourly PE emissions are based upon the following calculation:

$$\text{Maximum PE lb/hour} = \frac{(\text{Maximum Wood Throughput/hour})(\text{percent wood cut})(1 - \text{baghouse control efficiency})}{1}$$

$$(1200 \text{ lbs/hour}) (0.05) (1-0.99)$$

$$0.6 \text{ lb PE/hour}$$

"Percent wood cut" can be described as the percent of wood processed that is converted to PE. The figure used here is a conservative 5 percent. The "Baghouse control efficiency" figure of 99 percent is based upon the manufacturers specifications.

2. Emission Limitation:
PE shall not exceed 2.63 tons per year.

Applicable Compliance Method:

The annual PE limitation shall be calculated as follows:

$$\text{PE tons per year} = \frac{[\text{Maximum hourly PE emission rate}] (8,760 \text{ hours/year})}{2000 \text{ lbs/ton}}$$

$$[0.6 \text{ lb/hour} * 8,760 \text{ hours}] \div 2000 \text{ lbs/ton}$$

$$[5,256 \text{ lbs/year}] \div 2000 \text{ lbs/ton}$$

$$2.63 \text{ tons/year}$$

3. Emission Limitation:
Visible PE shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, U.S. EPA Method 9 shall be used to determine compliance with the visible PE limitation.

VI. Miscellaneous Requirements

The permittee shall submit a Compliance Assurance Monitoring (CAM) Plan for this emissions unit as part of an application for an operating permit as required under Part I.A.10 of the General Terms and Conditions. The CAM Plan shall conform to the requirements detailed in 40 CFR Part 64.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P101 - Wood Shop	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None