

Synthetic Minor Determination and/or  Netting Determination

Permit To Install: "05-14394"

**A. Source Description**

American Trim, L.L.C. Sidney facility, has an coating and printing operations plant at 1501 west Michigan street., Sidney, Shelby County, Ohio. This Permit to Install (PTI) is to cover the installation of a new 2MM Btu/hr Natural gas fired oven replacement of existing electric oven on emission unit K006 (C-4) . At present, this facility is defined as a Minor Source under PSD regulations.

**B. Facility Emissions and Attainment Status**

Shelby County is attainment for all criteria pollutants. The American trim, L.L.C ., Sidney Facility is defined as a non-major stationary source, at this time, for all criteria pollutants thresholds under Prevention of Significant Deterioration (PSD) standards. The facility is a Title V for individual HAP, Combined HAPs, and VOC.

**C. Source Emissions**

This PTI will cover a synthetic minor request from American Trim to limit the release of HAP(s) from their non-insignificant emissions units to below the major thresholds in 40 CFR Part 63 Subpart M, the MACT Standard for Miscellaneous Metal Coating Operations. The following emissions units are being used in this PTI to cover the three significant production operations at this facility: small appliance and other small metal coating; automotive coating; and chrome coating.

1. K006, Coating and Printing Operation. This emission unit will not change any of the already existing coating operation and/or limitations.
2. K046, E-Coat line w/ natural gas-fired drying oven. This emission unit will not change any of the already existing coating operation and/or limitations.
3. K051, Bumper Coating. This emission unit will not change any of the already existing coating operation and/or limitations.

Special terms and conditions have been added to each of these three emissions units to address and limit the HAP(s) emissions from all of the " non-insignificant emissions units" at the this facility. "Non-insignificant" at present include the following emissions units: K001, K005-K009, K022, K033, K045, K046, K048, K050, K051, P080-P116, P141, and P142.

**D. Conclusion:**

American Trim, Sidney Facility, Ohio, Coating and Printing Plant, is defined as a minor source for Federal Regulation under PSD. At present, American Trim is a Title V facility based on VOC and HAP(s) emissions. In this PTI, the HAP(s) emissions will be limited to below Title V and 40 CFR Part 63 Subpart M thresholds. American Trim has requested to be limited to 9.0 tons per 12-month rolling period for individual HAP and 22.5 tons for combined HAP(s) from their non-insignificant emissions units. These requested limitations take into account the potential HAP(s) emissions from all existing insignificant, "de minimis", and exempt emissions units at this facility. By addressing the potential in determining applicable limitations, American Trim assures compliance and minimizes the record keeping on their



non-insignificant emissions units

State of Ohio Environmental Protection Agency

Street /

Address:  
Ohio Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
SHELBY COUNTY  
Application No: 05-14394  
Fac ID: 0575010106**

**CERTIFIED MAIL**

**DATE:** 10/24/2006

American Trim L.L.C.  
Rajesh Thotakura  
1501 W Michigan Ave  
Sidney, OH 45365

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, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

SWDO

IN

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-14394 FOR AN AIR CONTAMINANT SOURCE FOR  
American Trim L.L.C.**

On 10/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **American Trim L.L.C.**, located at **1501 W Michigan Ave, Sidney, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14394:

**Facility is requesting Federally Enforceable limitations on the facility wide emission of HAP(s) to be a synthetic minor for MACT Subpart MMMM.**

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

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



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**Permit To Install  
Terms and Conditions**

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

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**DRAFT PERMIT TO INSTALL 05-14394**

Application Number: 05-14394  
Facility ID: 0575010106  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: American Trim L.L.C.  
Person to Contact: Rajesh Thotakura  
Address: 1501 W Michigan Ave  
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1501 W Michigan Ave  
Sidney, Ohio**

Description of proposed emissions unit(s):  
**Facility is requesting Federally Enforceable limitations on the facility wide emission of HAP(s) to be a synthetic minor for MACT Subpart Mmmm.**

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

American Trim L.L.C.  
PTI Application: 05-14394  
Issued: To be entered upon final issuance  
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0575010106

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

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and

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October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

## 2. Scheduled Maintenance/Malfunction Reporting

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

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

## 3. Risk Management Plans

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

## 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.

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## 5. Severability Clause

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

## 6. General Requirements

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

## 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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## 8. Federal and State Enforceability

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

## 9. Compliance Requirements

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

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frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## 10. Permit-To-Operate Application

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

## 11. Best Available Technology

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

## 12. Air Pollution Nuisance

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.

## 13. Permit-To-Install

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

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permit.**

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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 shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

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

### **4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or

**American Trim L.L.C.****Facility ID: 0575010106****PTI Application: 05-14394****Issued: To be entered upon final issuance**

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

## **5. Construction of New Sources(s)**

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

## **6. Public Disclosure**

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

## **7. Applicability**

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

## **8. Construction Compliance Certification**

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

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

**American Trim L.L.C.**

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

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	55.75
S02	0.0151
PE	0.447
PM10	0.447
NOx	5.498
CO	3.06
HAP	9.0
HAP(s)	22.5

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY\* for any single HAP and 22.5 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

**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.

**Operations, Property, and/or Equipment - (K006) - Coating/Printing press w/ gas-fired oven (C-4)**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	<p>The Volatile organic compound (VOC) content of the coatings shall not exceed 5.35 pounds per gallon.</p> <p>The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:</p> <p>0.413 lb/hr and 1.809 tons/yr nitrogen oxides (NO<sub>x</sub>)                      0.168 lb/hr and 0.736 ton/yr carbon monoxide (CO)                      0.01 lb/hr and 0.057 ton/yr filterable particulate emissions (PE)                      0.015 lb/hr and 0.067 ton/yr PM<sub>10</sub>                      0.001 lb/hr and 0.005 ton/yr sulfur dioxide (SO<sub>2</sub>)                      0.011 lb/hr and 0.048 ton/yr VOC</p> <p>Compliance with the requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-09(U)(2)(e)(iii).</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid requirements of 40 CFR Part 63 Subpart M	<p>The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.</p> <p>The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY* for any single HAP and 22.5 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.</p> <p>See section A.2.c.</p>
OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven
OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Emissions Unit ID: K006

OAC rule 3745-21-08(B)	None. See A.I.2.b.
OAC rule 3745-23-06(B)	None. See A.I.2.b.
OAC rule 3745-21-09(U)(2)(e)(iii)	The coatings usage in this emissions unit shall not exceed ten gallons per day.
40 CFR 63, Subpart M	See Part II of this permit.

## 2. Additional Terms and Conditions

**2.a** The emission limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

**2.b** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

**2.c** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY\* for any single HAP and 22.5 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.

Emissions Unit ID: K006

## II. Operational Restrictions

1. The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.
2. The combined emissions of VOC from emissions units K005 through K009, inclusive, shall not exceed 14.87 tons per rolling, 12-month period, calculated according to the following formula:

$$[\text{SUM of all } \{(P_i)(VOC_i) \div 2000\} - \{(R_p)(P_o)(VOC_o) \div 2000\}]$$

where:

$P_i$  = usage of each coating, cleanup, or restoration material in gallons;

$VOC_i$  = volatile Organic compound content of each coating, cleanup, or restoration material in pounds VOC per gallon;

$R_p$  = ratio of solvent used on emissions units K005 through K009 to (total solvent used on all emissions units - the amount of solvent used on emissions unit K045);

$P_o$  = total gallons of recovered solvents less the gallons of solvent recovered from emissions unit K045, for the subject time period; and

$VOC_o$  = VOC content of recovered solvents in pounds of VOC per gallon

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day this emissions unit is in operation:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all the coatings employed; and
  - d. the VOC content of each coating employed, in lbs/gallon of coating.
2. The permittee shall collect and record the following information each month for emissions units K005 through K009, combined:
  - a. the name or identification number for each coating and cleanup/restoration solvent employed;
  - b. the VOC content of each coating and cleanup/restoration solvent material employed, in pounds per gallon, as applied;

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- c. the volume, in gallons, of each coating and cleanup/restoration solvent material employed;
  - d. the VOC emissions, in tons, as determined by the equation in Section A.II.2. of these terms and conditions; and
  - e. the rolling, 12-month VOC emissions, in tons.
3. For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in all non-insignificant emissions units at this facility:
- 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

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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.

**IV. Reporting Requirements**

1. The permittee shall submit the following quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, for the following information:
  - a. all exceedances of the maximum daily coating usage limitation of 10 gallons;
  - b. all exceedances of the maximum allowable coatings VOC content of 5.35 pounds per gallon, as applied;
  - c. all exceedances of the rolling, 12-month VOC emission limitation of 14.87 tons (for emissions units K005 through K009, combined);
  - d. an identification of each month during which the individual HAP emissions from all non-insignificant emissions units at this facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
  - e. an identification of each month during which the combined HAP emissions all non-insignificant emissions units at this facility exceeded 22.5 tons per year, based on a 12-month rolling average.
2. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit. 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.

**V. 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:

**American Trim L.L.C.**

**DTI Application: 05 11201**

**Facility ID: 0575010106**

Emissions Unit ID: K006

The VOC content of the coatings shall not exceed 5.35 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in Section A.III.1 of this permit.

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b. Emission Limitation:

The VOC emissions shall not exceed 14.87 tons per rolling, 12-month period (for emissions units K005 through K009, combined)

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section A.III.2 of this permit.

c. Emission Limitation:

The VOC emissions shall not exceed 14.87 tons per rolling, 12-month period (for this emissions unit)

Applicable Compliance Method:

As long as compliance with the combined annual VOC emission limitation (for emissions unit K005 through K009, combined) is maintained, compliance with the annual VOC emission limitation for this emission unit shall be assumed.

d. Operational Restriction:

10 gallons of coatings/day

Applicable Compliance Method:

Compliance with the operational restriction above shall be demonstrated through the record keeping requirements as established in Section A.III.1 of this permit.

e. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures

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specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitations:

0.413 lb/hr and 1.809 tons/yr NO<sub>x</sub>  
0.168 lb/hr and 0.736 ton/yr CO  
0.01 lb/hr and 0.057 ton/yr PE  
0.015 lb/hr and 0,067 ton/yr PM<sub>10</sub>  
0.001 lb/hr and 0.005 ton/yr SO<sub>2</sub>  
0.011 lb/hr and 0.048 ton/yr VOC

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

- i. for NO<sub>x</sub>, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;
- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM<sub>10</sub>, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO<sub>2</sub>, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

2. Formulation data of USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

**American Trim L.L.C.**  
DTI Application: 05 14304

**Facility ID: 0575010106**

Emissions Unit ID: K006

**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.

**Operations, Property, and/or Equipment - (K006) - Coating/Printing press w/ gas-fired oven (C-4)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (K006) 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 ethyl ketone (MEK)

TLV (mg/m<sup>3</sup>): 590 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (g/sec): 0.43

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1590

MAGLC (ug/m3): 14,000

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
2. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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":

**American Trim L.L.C.**

DTL Application: 05 11201

**Facility ID: 0575010106**

Emissions Unit ID: K006

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the 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.

If the permittee determines that the "Air Toxics 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.

**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.

**Operations, Property, and/or Equipment - (K046) - E-Coat, w/ electrodeposition tank and natural gas-fired oven**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	<p>The Volatile Organic Compounds (VOC) content of replenishment material used in this emissions unit shall not exceed 0.19 lb/gallon, as applied</p> <p>See A.2.b, below.</p> <p>The VOC content of cleanup materials employed on this emission unit shall not exceed 0.68 lb VOC/lb cleanup material</p> <p>The emissions from natural gas combustion in the drying ovens shall not exceed the following:</p> <p>0.429 lb/hr and 1.88 tons/yr NO<sub>x</sub>;  0.36 lb/hr and 1.58 tons/yr CO;  0.033 lb/hr and 0.14 ton/yr filterable PM;  0.003 lb/hr and 0.01 ton/yr SO<sub>2</sub>; and  0.024 lb/hr and 0.1 ton/yr VOC.</p> <p>See A.2.a, below.</p>

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OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid requirements of 40 CFR Part 63 Subpart M and PSD Applicability Threshold	<p>The maximum replenishment material usage for this emissions unit shall not exceed 100,000 gallons per rolling 12-month period.</p> <p>The maximum cleanup material usage for this emissions unit shall not exceed 150 gallons per rolling 12-month period.</p> <p>Emissions of VOC excluding oven emissions shall not exceed 9.93 tons per rolling 12-month period.</p> <p>The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY* for any single HAP and 22.5 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.</p> <p>See section A.2.d.</p>
OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven
OAC rule 3745-17-11(B) (for the drying ovens)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-21-08(B)	None. See A.1.2.c.
OAC rule 3745-23-06(B)	None. See A.1.2.c.
40 CFR 63, Subpart M	See Part II of this permit.

**2. Additional Terms and Conditions**

- 2.a** The emission limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from combustion of natural gas in the drying oven is established to reflect potential to emit for this emissions unit. Therefore, record keeping and reporting requirements are not necessary to ensure compliance with these limits.
- 2.b** This limitation, for the Powerchon 590 Black coating, calculates to 0.64 lb VOC per gallon of coating minus water and exempt solvents, and is more stringent than the limits found in OAC rule 3745-21-09(U).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available

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control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

- 2.d** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY\* for any single HAP and 22.5 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.

## II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

## III. Monitoring and/or Recordkeeping 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, as applied;
  - b. the VOC content of each coating, as applied;
  - c. the VOC content of each cleanup material employed;
  - d. the volume in gallons of each coating employed;

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- e. the volume in gallons of each cleanup material employed;
  - f. the monthly VOC emissions from the coatings, and cleanup materials employed, i.e., multiply the monthly volume, in gallons, of each coating and cleanup/pan solvent material employed by its respective VOC content, and summarize the results;
  - g. the rolling, 12 month usage summation for coatings, and cleanup materials employed; and
  - h. the rolling, 12 month summation of VOC emissions from the coating, and cleanup material employed, prior to any credit for recovered materials.
2. For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
3. The permittee shall collect and record the following information each month for the HAP(s) employed in all non-insignificant emissions units at this facility:
- 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

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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.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup material. These notifications 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 submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 12 month usage limitation for coatings replenishment materials of 100,000 gallons;
  - b. the rolling, 12 month usage limitation for cleanup materials of 150 gallons;
  - c. an identification of each month during which the individual HAP emissions from all non-insignificant emissions units at this 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 all non-insignificant emissions units at this facility exceeded 22.5 tons per year, based on a 12-month rolling average.

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.1.c.

3. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas in this emissions unit. 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.

#### V. Testing Requirements

1. Emission Limitations:

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The VOC content of replenishment material used in this emissions unit shall not exceed 0.19 lb/gallon.

The VOC content of cleanup materials employed on this emission unit shall not exceed 0.68 lb VOC/lb of cleanup material

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials. The record keeping requirements contained in Section III.1 shall demonstrate that only materials with these VOC content limitations are applied.

2. The emissions from natural gas combustion in the drying ovens shall not exceed the following:

0.429 lb/hr and 1.88 tons/yr NO<sub>x</sub>;  
0.36 lb/hr and 1.58 tons/yr CO;  
0.033 lb/hr and 0.14 ton/yr filterable PM;  
0.003 lb/hr and 0.01 ton/yr SO<sub>2</sub>; and  
0.024 lb/hr and 0.1 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/10<sup>6</sup> scf) multiplied by the maximum hourly gas burning capacity of the burners (4.375 mmBtu) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

3. Emission Limitation:

Emissions of VOC excluding oven emissions shall not exceed 9.93 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be assumed so long as the permittee does not exceed the VOC content limitations for both coatings (0.19 lb/gallon) and cleanup materials (0.68 lb/lb of cleanup material), nor the usage limitations for coatings (100,000 gallons) and cleanup materials (150 gallons). Compliance may also be demonstrated through the following calculation:

$$9.93 \quad \text{tonsVOC} \geq \sum_{n=1}^i \frac{(P_i)(\text{VOC}_i)[1 - (\text{capture} * \text{DRE})]}{2000 \text{ lbs/ton}}$$

where:

$P_i$  = usage of coating  $i$  or cleanup material  $i$  in gallons

$\text{VOC}_i$  = volatile Organic compound content of coating  $i$  or cleanup material  $i$  in pounds VOC per gallon.

capture = the capture efficiency, assumed to be 0%

DRE = destruction removal efficiency of any control device, 0% without controls

$i$  = total number of unique coatings and cleanup materials used in this emissions unit during the 12-month period.

4. Emission Limitation:  
0.02 lb PE per mmBtu for the drying oven

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Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas for this emissions unit. If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**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.

**Operations, Property, and/or Equipment - (K046) - E-Coat, w/ electrodeposition tank and natural gas-fired oven**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (K006) 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: Carbon Black

TLV (mg/m<sup>3</sup>): 3.5 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (g/sec): 0.133

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.08

MAGLC (ug/m3): 83.33

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
2. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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":

Emissions Unit ID: K046

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the 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.

If the permittee determines that the "Air Toxics 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.

**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.

**Operations, Property, and/or Equipment - (K051) - Dry filter Spray Booth w/ natural gas propane fired drying oven**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.</p> <p>Ohio Toxic Policy</p>
OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid requirements of 40 CFR Part 63 Subpart M	<p>Volatile organic compound (VOC) emissions from the coatings employed shall not exceed 30.8 tons/ 12-month rolling period.</p> <p>The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY* for any single HAP and 22.5 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.</p> <p>See section A.2.c.</p>
OAC rule 3745-21-09(U)	The VOC coating limitation specified by this rule is equal to or less stringent than the VOC coating limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven
OAC rule 3745-17-11	The Particulate Emissions (PE) shall not exceed 7.08 lbs per hour
OAC rule 3745-21-08(B)	See A.I.2.b.
OAC rule 3745-23-06(B)	See A.I.2.b.

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OAC rule 3745-21-07(B)	See A.I.2.a.
40 CFR 63, Subpart Mmmm	See Part II.A.I. of this permit.

## 2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B), respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.
- 2.b** On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.
- 2.c** The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY\* for any single HAP and 22.5 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.

## II. Operational Restrictions

- The volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
- The cleanup materials employed in this emissions unit shall only be non-volatile organic materials.

## III. Monitoring and/or Recordkeeping Requirements

- The permittee shall collect and record the following information each month for the line:
  - the name and identification number of each coating, as applied; and
  - the VOC content of each coating (excluding water and exempt solvents), as applied.

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2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. the name and identification of each cleanup material employed;
  - b. the VOC content of each cleanup material, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
3. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
  - c. The number of gallons (excluding water and exempt solvents) of each coating employed.
4. The permittee shall collect and record the following information each month for the HAP(s) employed in all non-insignificant emissions units at this facility:
  - 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)];

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- 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.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
3. The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
4. The permittee shall submit the following quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, for the following information:
  - a. an identification of each month during which the individual HAP emissions from all non-insignificant emissions units at the facility exceeded 9.0 tons per year, based

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on a 12-month rolling average; and

- b. an identification of each month during which the combined HAP emissions from all non-insignificant emissions units at the facility exceeded 22.5 tons per year, based on a 12-month rolling average.

**V. 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):

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a. Emission Limitation:

The VOC content of the coatings shall not exceed 3.50 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in Section A.III.1 of this permit.

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitations:

0.413 lb/hr and 1.809 tons/yr NO<sub>x</sub>  
0.168 lb/hr and 0.736 ton/yr CO  
0.01 lb/hr and 0.057 ton/yr PE  
0.015 lb/hr and 0,067 ton/yr PM<sub>10</sub>  
0.001 lb/hr and 0.005 ton/yr SO<sub>2</sub>  
0.011 lb/hr and 0.048 ton/yr VOC

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

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- i. for NO<sub>x</sub>, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;
- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM<sub>10</sub>, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO<sub>2</sub>, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

**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.

**Operations, Property, and/or Equipment - (K051) - Dry filter Spray Booth w/ natural gas propane fired drying oven**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
none	none

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emission unit (K051) was evaluated based on the actual materials and the design parameters of the emission units as specified in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emission 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" usage for this pollutant.

Pollutant: Butoxyl ethanol

Maximum Hourly Emission Rate: 0.35 lbs / hour

Predicted 1-Hour Maximum Ground-Level Concentration: 2.2E-5 mg/m3 at 141 m

MAGLC: 0.57 mg/m3

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2. Physical changes or changes in the method of operation of the emission unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 Toxics Policy" will be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that affect the parameters used in applying the "Air Toxics Policy" include the following:
  - a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated by the most recent version of the handbook entitled "American Governmental Industrial Hygienists (ACGIH)," than the lowest TLV 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 Toxics 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**American Trim L.L.C.**  
**DTI Application: 05 14304**

**Facility ID: 0575010106**

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