Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install **06-07854**

A. Source Description

TS Tech North America - Athens is proposing to operate two adhesive spray booths for interior automotive trim at its facility in Athens, Ohio. Emissions units K001 and K002 have proposed hourly emissions of total Organic Compounds of 27.42 lbs/hr including coatings and cleanup. The result is a potential exceedance of Title V thresholds for VOC and HAPs.

B. Facility Emissions and Attainment Status

Athens County is attainment for all pollutants. The purpose of this synthetic minor is to restrict annual emissions through a gallons per year restriction. K001 and K002 are the only emission units located at the facility. PTE for the facility is 240 tons per year of OC and 102 tons per year of the highest single HAP.

C. Source Emissions

The facility is limited through federally enforceable STC's limiting each booth to 500 gallons of adhesive and no more than 150 gallons of cleanup solvent (MEK) per rolling 12-month period. The facility is required to track their hours of operation, keep daily and monthly usage records, and submit excursion reports. The facility seeks a restriction of less than ten tons of total OC per year, therefore compliance with the OC restriction will also demonstrate that HAPs are less than ten tons per year.

D. Conclusion

The emission limitations in this permit are adequate to provide a federally enforceable framework for assuring that applicable Title V thresholds will not be exceeded.

State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 06-07854
Fac ID: 0605010097

DATE: 7/7/2005

TS Tech North America-Athens
Steve Furniss
6380 West Canal St.
Canal Winchester, OH 43110

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 of 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 **$400** 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** **SEDO** **WV**

ATHENS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **06-07854** FOR AN AIR CONTAMINANT SOURCE FOR
TS Tech North America-Athens

On 7/7/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **TS Tech North America-Athens**, located at **10 Kenny Drive, Athens**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07854:

Spray booth and an electric infra red flash oven servicing two spray booths and ducted to a common emissions egress point.

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.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]

DRAFT PERMIT TO INSTALL 06-07854

Application Number:	06-07854
Facility ID:	0605010097
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	TS Tech North America-Athens
Person to Contact:	Steve Furniss
Address:	6380 West Canal St. Canal Winchester, OH 43110

Location of proposed air contaminant source(s) [emissions unit(s)]:
10 Kenny Drive
Athens, Ohio

Description of proposed emissions unit(s):
Spray booth and an electric infra red flash oven servicing two spray booths and ducted to a common emissions egress point.

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

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	4.98
PE	0.04

Emissions Unit ID: **K001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
	OAC rule 3745-35-07(B)
K001 - Adhesive Spray Booth SPPC001-A	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-11
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-21-07 (G)(2)

Applicable Emissions
Limitations/Control Measures

Total Organic Compound (OC) emissions, including cleanup material, shall not exceed 27.42 lbs/hr.

There shall be no visible particulate emissions (PE) from the exhaust stack.

PE shall not exceed 0.02 tpy.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11, and OAC rule 3745-35-07(B).

PE shall not exceed 0.38 lb/hr. See Section A.2.b. below.

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

See Section A.I.2.a. below.

K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period.

Total OC emissions shall not exceed 2.49 tons per rolling 12-month period.

2. Additional Terms and Conditions

2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

2.b The best available control technology for the control of PE from this source is to employ a dry filter media system. The dry filter media system shall be employed at all times when the emission unit is in operation.

B. Operational Restrictions

1. The amount of OC used in both adhesives and clean-up solvent shall not cause emissions to exceed 2.49 tons per rolling 12-month period., calculated using the following formula:

$$2.49 \text{ tons OC} \geq \sum_{n=1}^{i} \frac{(P_i)x(OC_i)}{2000}$$

where:

P_i=Usage of coating materials "i" in gallons or pounds (percent by mass weight of solvent contained within a gallon of coating material);

OC_i = OC content of coating materials "i" in pounds per gallon** or percent by weight;**

**this assumes when using pounds per gallon or percent by weight units, 100% of the organic solvent is emitted.

2. K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period. To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit K001, the permittee shall not exceed the usage levels specified in the following table:

Maximum Allowable Month(s)	Maximum Allowable Cumulative Adhesive Usage/Gallons	Maximum Allowable Cumulative cleanup solvent Usage/Gallons	Maximum Allowable Cumulative OC Emissions (Tons)
1	42	12.5	0.2
1-2	84	25.0	0.4
1-3	126	37.5	0.6
1-4	168	50.0	0.8
1-5	210	62.5	1.0
1-6	252	75.0	1.2
1-7	294	87.5	1.4
1-8	336	100.0	1.6
1-9	378	112.5	1.8
1-10	420	125.0	2.0
1-11	462	137.5	2.25
1-12	500	150.0	2.49

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual Adhesive Coating and Cleanup solvent usage restrictions, and total OC emission limitations shall be based upon a rolling, 12-month summation of the monthly usage/emissions figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for materials used in the emissions unit:

a. The company identification of each coating and cleanup material employed;

b. the total number of gallons of each coating and cleanup material employed;

c. the OC content of each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents;

d. the total OC emission rate in pounds (the sum of b. times c. for all coatings and cleanup materials employed);

e. the total number of hours the emissions unit was in operation;

f. the calculated average hourly OC emission rate in pounds per hour, based upon the total daily coatings and cleanup materials employed, and the actual hours of

operation of the emissions unit, i.e., d./e.; and

g. documentation for each coating and cleanup material as to whether it is or is not a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).

Note: The cleanup materials employed by this emissions unit are captured and shipped off-site for reclamation. Therefore, for the purpose of tracking emissions, the number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off-site.

2. The permittee shall collect and record the following information each month for the line:

a. The name and identification number of each coating, and cleanup material employed;

b. the OC content of each coating (excluding water and exempt solvents), and cleanup material, in pounds per gallon;

c. the number of gallons of each coating, and cleanup material employed;

d. the total OC emissions (OC applied) from all coatings, and cleanup materials employed [the sum of (1.b. times 1.c. divided by 2000 lb/ton) for all coatings and cleanup materials], in tons;

e. the rolling, 12-month summation of coatings employed, in gallons;

f. the rolling, 12-month summation of cleanup solvent employed, in gallons;

g. the rolling, 12-month summation of total OC emissions, in tons, and

h. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of the gallons of adhesive coating and clean-up material employed. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office 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 Ohio EPA Southeast District Office within 30 days following the end of the calendar month.

2. The permittee shall notify the Ohio EPA Southeast 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 Ohio EPA Southeast District Office within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month gallonage and OC emissions limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative gallonage and OC emissions limitations set forth in Section B.1. of this permit. These reports are due by the date described in Part 1- General Terms and Conditions.

E. Testing Requirements

1. Emission Limitation:

Total OC emissions, including cleanup material, shall not exceed 27.42 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements in section C.1. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

2. Emission Limitation:

There shall be no visible PE from the exhaust stack**.**

Applicable Compliance Method:

If required, compliance with the visible emissions limit 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). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to rule 3745-15-04 (A).

3. Emission Limitation:

PE shall not exceed 0.38 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

Constants: 1.6 lbs/particulate per gallon of adhesive
25% transfer efficiency (TE)
92% filter control efficiency (CE)

PE = 1.6lbs/gal(4 gal/hr)(.75 TE)(.08 CE)
PE = 0.38 lbs/hr

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation:

K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the operational restrictions contained in section B.2. and the record keeping required in Section C.1. and C.2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

5. Emission Limitation:

Total OC emissions shall not exceed 2.49 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the operational restrictions contained in section B.1. and B.2., and the record keeping required in Section C.1. and C.2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

6. Emission Limitation:

PE shall not exceed 0.02 tpy.

Applicable Compliance Method:
Compliance shall be based on the operational restrictions contained in section B.1. and B.2.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (K001) 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 (or other Ohio EPA approved 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: MEK
TLV (mg/m^3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 11.61
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1228
MAGLC (ug/m^3): 14,042.26

Pollutant: Hexane

TLV (mg/m^3): 176,237
Maximum Hourly Emission Rate (lbs/hr): 9.52
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1006
MAGLC (ug/m^3): 4,196.12

Pollutant: Tolulene

TLV (mg/m^3): 188,404
Maximum Hourly Emission Rate (lbs/hr): 9.52
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1006
MAGLC (ug/m^3): 4,485.8

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.

Emissions Unit ID: **K002**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K002 - Adhesive Spray Booth SPPC001-B	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07 (G)(2) OAC rule 3745-35-07(B)
	OAC rule 3745-17-11	
	OAC rule 3745-17-07(B)(1)	

Applicable Emissions <u>Limitations/Control Measures</u> Total Organic Compound (OC) emissions, including cleanup material, shall not exceed 27.42 lbs/hr. There shall be no visible particulate emissions (PE) from the exhaust stack. PE shall not exceed 0.02 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11, and OAC rule 3745-35-07(B). PE shall not exceed 0.38 lb/hr. See Section A.2.b. below. The emission limitation specified by this rule is less	stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.I.2.a. below. K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period. Total OC emissions shall not exceed 2.49 tons per rolling 12-month period.	

2. Additional Terms and Conditions

2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

2.b The best available control technology for the control of PE from this source is to employ a dry filter media system. The dry filter media system shall be employed at all times when the emission unit is in operation.

B. Operational Restrictions

1. The amount of OC used in both adhesives and clean-up solvent shall not cause emissions to exceed 2.49 tons per rolling 12-month period., calculated using the following formula:

$$2.49 \text{ tons OC} \geq \sum_{n=1}^{i} \frac{(P_i)x(OC_i)}{2000}$$

where:

P_i=Usage of coating materials "i" in gallons or pounds (percent by mass weight of solvent contained within a gallon of coating material);

OC_i = OC content of coating materials "i" in pounds per gallon** or percent by weight;**

**this assumes when using pounds per gallon or percent by weight units, 100% of the organic solvent is emitted.

2. K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period. To ensure enforceability during the first 12 calendar months of operation following the startup of emissions unit K001, the permittee shall not exceed the usage levels specified in the following table:

Maximum Allowable Month(s)	Maximum Allowable Cumulative Adhesive Usage/Gallons	Maximum Allowable Cumulative cleanup solvent Usage/Gallons	Maximum Allowable Cumulative OC Emissions (Tons)
1	42	12.5	0.2
1-2	84	25.0	0.4
1-3	126	37.5	0.6
1-4	168	50.0	0.8
1-5	210	62.5	1.0
1-6	252	75.0	1.2
1-7	294	87.5	1.4
1-8	336	100.0	1.6
1-9	378	112.5	1.8
1-10	420	125.0	2.0
1-11	462	137.5	2.25
1-12	500	150.0	2.49

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual Adhesive Coating and Cleanup solvent usage restrictions, and total OC emission limitations shall be based upon a rolling, 12-month summation of the monthly usage/emissions figures.

Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for materials used in the emissions unit:

a. The company identification of each coating and cleanup material employed;

b. the total number of gallons of each coating and cleanup material employed;

c. the OC content of each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents;

d. the total OC emission rate in pounds (the sum of b. times c. for all coatings and cleanup materials employed);

e. the total number of hours the emissions unit was in operation;

f. the calculated average hourly OC emission rate in pounds per hour, based upon the total daily coatings and cleanup materials employed, and the actual hours of operation of the emissions unit, i.e., d./e.; and

g. documentation for each coating and cleanup material as to whether it is or is not a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).

Note: The cleanup materials employed by this emissions unit are captured and shipped off-site for reclamation. Therefore, for the purpose of tracking emissions, the number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off-site.

2. The permittee shall collect and record the following information each month for the line:

a. The name and identification number of each coating, and cleanup material employed;

b. the OC content of each coating (excluding water and exempt solvents), and cleanup material, in pounds per gallon;

c. the number of gallons of each coating, and cleanup material employed;

d. the total OC emissions (OC applied) from all coatings, and cleanup materials employed [the sum of (1.b. times 1.c. divided by 2000 lb/ton) for all coatings and cleanup materials], in tons;

e. the rolling, 12-month summation of coatings employed, in gallons;

f. the rolling, 12-month summation of cleanup solvent employed, in gallons;

g. the rolling, 12-month summation of total OC emissions, in tons, and

h. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of the gallons of adhesive coating and clean-up material employed. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office 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 Ohio EPA Southeast District Office within 30 days following the end of the calendar month.

2. The permittee shall notify the Ohio EPA Southeast 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 Ohio EPA Southeast District Office within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month gallonage and OC emissions limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative gallonage and OC emissions limitations set forth in Section B.1. of this permit. These reports are due by the date described in Part 1- General Terms and Conditions.

Testing Requirements

1. Emission Limitation:

Total OC emissions, including cleanup material, shall not exceed 27.42 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements in section C.1. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

2. Emission Limitation:

There shall be no visible PE from the exhaust stack**.**

Applicable Compliance Method:

If required, compliance with the visible emissions limit 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). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to rule 3745-15-04 (A).

3. Emission Limitation:

PE shall not exceed 0.38 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

Constants: 1.6 lbs/particulate per gallon of adhesive
25% transfer efficiency (TE)
92% filter control efficiency (CE)

PE = 1.6lbs/gal(4 gal/hr)(.75 TE)(.08 CE)
PE = 0.38 lbs/hr

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation:

K001 shall not employ more than 500 gallons of adhesive coating, nor more than 150 gallons of cleanup solvent per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the operational restrictions contained in section B.2. and the record keeping required in Section C.1. and C.2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

5. Emission Limitation:

Total OC emissions shall not exceed 2.49 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the operational restrictions contained in section B.1. and B.2., and the record keeping required in Section C.1. and C.2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

6. Emission Limitation:

PE shall not exceed 0.02 tpy.

Applicable Compliance Method:
Compliance shall be based on the operational restrictions contained in section B.1. and B.2.

Miscellaneous Requirements

1. The permit to install for this emissions unit (K001) 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 (or other Ohio EPA approved 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: MEK

TLV (mg/m^3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 11.61
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1228
MAGLC (ug/m^3): 14,042.26

Pollutant: Hexane

TLV (mg/m^3): 176,237
Maximum Hourly Emission Rate (lbs/hr): 9.52
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1006
MAGLC (ug/m^3): 4,196.12

Pollutant: Tolulene

TLV (mg/m^3): 188,404
Maximum Hourly Emission Rate (lbs/hr): 9.52
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1006
MAGLC (ug/m^3): 4,485.8

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.