State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
GUERNSEY COUNTY

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

Application No: 06-06362

DATE: 7/24/2001

LDM Technologies Inc
Byron Shaurer
110 N Eighth St
Byesville, OH 43723

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **SEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

FINAL PERMIT TO INSTALL 06-06362

Application Number:	06-06362
APS Premise Number:	0630000007
Permit Fee:	**$700**
Name of Facility:	LDM Technologies Inc
Person to Contact:	Byron Shaurer
Address:	110 N Eighth St Byesville, OH 43723

Location of proposed air contaminant source(s) [emissions unit(s)]:
110 N Eighth St
Byesville, Ohio

Description of proposed emissions unit(s):
Modification of various existing booths (R014, R015, R016, R018 and R019) and installation of a new booth (R021) for painting plastic automotive parts.

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

Part I - GENERAL TERMS AND CONDITIONS

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) 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.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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.

5. 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.

6. 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.

7. 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.

8. 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).

9. 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.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC's	141.69
PM	14.46

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Emissions Unit ID: R014

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R014 - Prime Booth 1 (Spray Booth 4-10)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total OC emission rate for all coatings and cleanup materials, in pounds per day;

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

g. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.

2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1.

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed

during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI 06-4395 issued April 12, 1995.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R014 - Prime Booth 1 (Spray Booth 4-10)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R015 - Prime Booth 2 (Spray Booth 4-11)	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
	OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total OC emission rate for all coatings and cleanup materials, in pounds per day;

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

g. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials

exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.

2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Emission Limitation:

Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials.
Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI 06-4395 issued April 12, 1995.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R015 - Prime Booth 2 (Spray Booth 4-11)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R016 - Paint Booth 1 (Spray Booth 4-12) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 11.13 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 48.75 tpy, including cleanup materials. See Sections A.I.2.b and A.I.2.c
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-21-07(G)(6)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

2.b The permittee shall capture 100% of OC's applied within the system in accordance with OAC rule 3745-31-05.

2.c The permittee shall employ a zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 330 degrees Fahrenheit.

3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

4. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

5. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

6. Cleanup solvents shall be captured and recycled to the greatest extent possible.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be

capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual revolutions per hour (RPH) for the rotor wheelhouse and maintain a record of the result.

3. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;

e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance and all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit.
The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit was in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 11.13 lbs/hr, and the actual average hourly OC emissions for each such day.

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. <u>Emission Limitation:</u>

Emissions Unit ID: R016

Organic compound (OC) emissions shall not exceed 11.13 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.5. and the record keeping requirements of section A.III.3.

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 48.75 tpy, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup or startup of the modified emissions unit. The testing shall be performed while emissions units R016, R018, R019, R021 and P007 are in operation. The aforementioned emission testing shall also qualify as the initial test required in accordance with the facility Title V permit.

b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency, 90% control efficiency and mass emissions limitations for OC's.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25 and/or Method 25A if less than 50 ppm, of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total

concentration, and on a consideration of the potential presence of interfering gases."

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

6. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI 06-4395 issued April 12, 1995.

Emissions Unit ID: R016

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R016 - Paint Booth 1 (Spray Booth 4-12) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	Compliance with the Air Toxics Policy. See Sections B.III.1., 2. and 3.

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 (R016) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: Butyl Alcohol (n-Butanol)
TLV (ug/m^3): 61,000
Maximum Hourly Emission Rate (lbs/hr): 2.08*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019 and R021 combined.

2. 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 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 specified in the above table;

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.

3. The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R018 - Paint Booth 2 (Spray Booth 4-14) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 5.57 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 24.38 tpy, including cleanup materials. See Sections A.I.2.b and A.I.2.c
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-21-07(G)(6)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

2.b The permittee shall capture 100% of OC's applied within the system in accordance with OAC rule 3745-31-05.

2.c The permittee shall employ a zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 330 degrees Fahrenheit.

3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

4. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

5. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

6. Cleanup solvents shall be captured and recycled to the greatest extent possible.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual revolutions per hour (RPH) for the rotor wheelhouse and maintain a record of the result.

3. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;

e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance and all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit.
The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit was in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 5.57 lbs/hr, and the actual average hourly OC emissions for each such day.

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The deviation reports shall be submitted in accordance with the requirements specified in Part I -

General Term and Condition A.1.c.

V. Testing Requirements

1. Emission Limitation:

Organic compound (OC) emissions shall not exceed 5.57 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.5. and the record keeping requirements of section A.III.3.

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 24.38 tpy, including cleanup materials.
Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup or startup of the modified emissions unit. The testing shall be performed while emissions units R016, R018, R019, R021 and P007 are in operation. The aforementioned emission testing shall also qualify as the initial test required in accordance with the facility Title V permit.

b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency, 90% control efficiency and mass emissions limitations for OC's.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25 and/or Method 25A if less than 50 ppm, of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC

rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

6. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI 06-4395 issued April 12, 1995.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R018 - Paint Booth 2 (Spray Booth 4-14) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	Compliance with the Air Toxics Policy. See Sections B.III.1., 2. and 3.

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 (R018) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: Butyl Alcohol (n-Butanol)
TLV (ug/m^3): 61,000
Maximum Hourly Emission Rate (lbs/hr): 2.08*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019 and R021 combined.

2. 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 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 specified in the above table;

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.

3. The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R019 - Clearcoat Booth 2 (Spray Booth 4-15) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 10.24 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 44.85 tpy, including cleanup materials. See Sections A.I.2.b and A.I.2.c
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-21-07(G)(6)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

2.b The permittee shall capture 100% of OC's applied within the system in accordance with OAC rule 3745-31-05.

2.c The permittee shall employ a zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 330 degrees Fahrenheit.

3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

4. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

5. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

6. Cleanup solvents shall be captured and recycled to the greatest extent possible.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual revolutions per hour (RPH) for the rotor wheelhouse and maintain a record of the result.

3. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;

e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most

recent performance test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance and all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit.
The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit was in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 10.24 lbs/hr, and the actual average hourly OC emissions for each such day.

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Emission Limitation:

Organic compound (OC) emissions shall not exceed 10.24 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.5. and the record keeping requirements of section A.III.3.

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 44.85 tpy, including cleanup materials.
Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in

accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup or startup of the modified emissions unit. The testing shall be performed while emissions units R016, R018, R019, R021 and P007 are in operation. The aforementioned emission testing shall also qualify as the initial test required in accordance with the facility Title V permit.

b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency, 90% control efficiency and mass emissions limitations for OC's.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25 and/or Method 25A if less than 50 ppm, of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such

notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

6. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI 06-4395 issued April 12, 1995.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R019 - Clearcoat Booth 2 (Spray Booth 4-15) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	Compliance with the Air Toxics Policy. See Sections B.III.1., 2. and 3.

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 (R019) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: Butyl Alcohol (n-Butanol)
TLV (ug/m^3): 61,000
Maximum Hourly Emission Rate (lbs/hr): 2.08*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019 and R021 combined.

2. 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 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 specified in the above table;

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.

3. The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R021 - Clearcoat Booth 1 (Spray Booth 4-17) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B). Organic compound (OC) emissions shall not exceed 2.56 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 11.21 tpy, including cleanup materials. See Sections A.I.2.b and A.I.2.c
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a
	OAC rule 3745-21-07(G)(6)	See Section A.I.2.a
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

OAC rule 3745-17-11(B)	PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year

2. Additional Terms and Conditions

2.a The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

2.b The permittee shall capture 100% of OC's applied within the system in accordance with OAC rule 3745-31-05.

2.c The permittee shall employ a zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 330 degrees Fahrenheit.

3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

4. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

5. The permittee shall employ particulate removal having a design control efficiency for particulate matter greater than 99% during any operation of the emissions unit.

6. Cleanup solvents shall be captured and recycled to the greatest extent possible.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day for the control equipment:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit; and

c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual revolutions per hour (RPH) for the rotor wheelhouse and maintain a record of the result.

3. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and cleanup material employed;

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

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

d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;

e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

4. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance and all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was less than 330 degrees Fahrenheit.
The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit was in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 2.56 lbs/hr, and the actual average hourly OC emissions for each such day.

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The deviation reports shall be submitted in accordance with the requirements specified in Part I -

General Term and Condition A.1.c.

V. Testing Requirements

1. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.56 lbs/hr, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.5. and the record keeping requirements of section A.III.3.

2. Emission Limitation:

Maximum annual OC emissions shall not exceed 11.21 tpy, including cleanup materials.
Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

3. Emission Limitation:

PM emissions shall not exceed 0.551 pounds per hour and 2.41 tons per year**.**

Applicable Compliance Method:

Compliance with the particulate matter emission limits shall be determined by multiplying the maximum uncontrolled emissions rate for particulate matter (lb PM/hr) by the design control efficiency (99% minimum) as follows:

(lb PM/gal)(gal/hr)(1-0.99) = lb PM/hr

(lb PM/hr)(8760 hr/yr)(0.0005 ton/lb) = tons per year PM

Neither the hourly nor the annual PM emission limits can be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

4. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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).

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup or startup of the modified emissions unit. The testing shall be performed while emissions units R016, R018, R019, R021 and P007 are in operation. The aforementioned emission testing shall also qualify as the initial test required in accordance with the facility Title V permit.

b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency, 90% control efficiency and mass emissions limitations for OC's.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 25 and/or Method 25A if less than 50 ppm, of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while all the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC

rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

6. Formulation data or USEPA Method 24 shall be used to determine the organic compound (OC) contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R021 - Clearcoat Booth 1 (Spray Booth 4-17) controlled with a zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05 (A)(3)	Compliance with the Air Toxics Policy. See Sections B.III.1., 2. and 3.

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 (R021) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 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: Butyl Alcohol (n-Butanol)
TLV (ug/m^3): 61,000
Maximum Hourly Emission Rate (lbs/hr): 2.08*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019 and R021 combined.

2. 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 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 specified in the above table;

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.

3. The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None