

Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following:
  - a. 1500 million cubic feet of natural gas, as a rolling, 12-month summation;
  - b. 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and
  - c. 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.
2. The permittee shall maintain monthly records of the following information for the facility:
  - a. the natural gas usage, in million cubic feet;
  - b. the No. 2 fuel oil usage, in gallons;
  - c. the percent sulfur content, by weight, for the No. 2 fuel oil employed;
  - d. the rolling, 12-month summation of the monthly natural gas usage rates; and
  - e. the rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.
3. For each shipment of oil received for burning, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content. A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage limitation of 1500 million cubic feet, the rolling, 12-month No. 2 fuel oil usage limitation of 1.0 million gallons, and/or the No. 2 fuel oil sulfur content limitation of 0.5%, by weight. These reports shall be due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.
6. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Sulfur Content Limitation:  
0.5%, by weight sulfur content  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in sections II.A.3. and 4. above.
  - b. Operational Restrictions:  
1500 million cubic feet of natural gas/rolling, 12-month summation  
1.0 million gallons of no. 2 fuel oil/rolling, 12-month summation  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in sections II.A.2. above.
7. T001 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);  
T002 - volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);  
T005 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);  
T006 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

T007 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);  
 T008 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);  
 T009 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);  
 T010 - virgin solvent storage tank (exempt per OAC rule 3745-31-03);  
 T011 - virgin solvent storage tank (exempt per OAC rule 3745-31-03);  
 T012 - BPA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03);  
 T013 - non-voltil. material storage tank and dispensing (exempt per OAC rule 3745-31-03);  
 Z005 - PA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03);  
 Z006 - fire pump No. 1 (exempt per OAC rule 3745-31-03);  
 Z007 - fire pump No. 2 (exempt per OAC rule 3745-31-03);  
 Z008 - emergency generator No. 1 (exempt per OAC rule 3745-31-03);  
 Z014 - ST cold cleaner (exempt per OAC rule 3745-31-03);  
 Z018 - Bonderite storage tank (exempt per OAC rule 3745-31-03);  
 Z019 - muriatic acid storage tank (exempt per OAC rule 3745-31-03);  
 Z023 - air handler No. 24 (exempt per OAC rule 3745-31-03);  
 Z025 - air handler No. 26 (exempt per OAC rule 3745-31-03);  
 Z026 - air handler No. 27 (exempt per OAC rule 3745-31-03);  
 Z051 - MOS cold cleaner (exempt per OAC rule 3745-31-03);  
 Z052 - MS parts washer (exempt per OAC rule 3745-31-03);  
 Z071 - PA cold cleaner - final repair (exempt per OAC rule 3745-31-03);  
 Z073 - PA cold cleaner - final repair (exempt per OAC rule 3745-31-03);  
 Z079 - PA cold cleaner - cavity wax booth/inner (exempt per OAC rule 3745-31-03);  
 Z084 - PA cold cleaner - clearcoat B booth/interior check (exempt per OAC rule 3745-31-03);  
 Z088 - PA cold cleaner - basecoat B booth/operating area (exempt per OAC rule 3745-31-03);  
 Z089 - PA cold cleaner - basecoat A booth/operating area (exempt per OAC rule 3745-31-03);  
 Z090 - PA cold cleaner - clearcoat A booth/interior check (exempt per OAC rule 3745-31-03);  
 Z094 - PA cold cleaner - primer booth/interior check (exempt per OAC rule 3745-31-03);  
 Z099 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z100 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z101 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z102 - PA cold cleaner - maintenance oil storage (exempt per OAC rule 3745-31-03);  
 Z103 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);  
 Z104 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);  
 Z106 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);  
 Z107 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);  
 Z115 - cold cleaner - AF maintenance cage (exempt per OAC rule 3745-31-03);  
 Z119 - cold cleaner 1 - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z120 - cold cleaner 2 - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z121 - cold cleaner 3 - maintenance cage (exempt per OAC rule 3745-31-03);  
 Z122 - cold cleaner 1 - paint mix room (exempt per OAC rule 3745-31-03);  
 Z123 - cold cleaner 2 - paint mix room (exempt per OAC rule 3745-31-03);  
 Z124 - AQ cold cleaner - shop area (exempt per OAC rule 3745-31-03);  
 Z125 - cold cleaner - paint OTP maintenance cage (exempt per OAC rule 3745-31-03);  
 Z126 - cold cleaner - MPW cage (exempt per OAC rule 3745-31-03);  
 Z127 - paint gun washer and recycler (exempt per OAC rule 3745-31-03); and  
 Z130 - ELP gas plaza (exempt per OAC rule 3745-31-03)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

The following emissions units are defined as insignificant emission units at this facility and meet the requirements of either an exemption under OAC rule 3745-31-03 or have a uncontrolled potential of less than 5 tons per year as defined under OAC rule 3745-77-01(U):

B007 - air handler No. 25 (PTI 05-10022, issued 5/19/99);  
 G001 - AF gasoline/diesel dispensing (exempt per OAC rule 3745-31-03);  
 G002 - AQ gasoline dispensing (exempt per OAC rule 3745-31-03);  
 K018 - WE rust prevention (PTI 05-7914, issued on 7/24/96);  
 P001 - pretreatment/phosphate process (PTI 05-7923, modification issued 1/08/08);  
 P002 - body line paint effluent system (PTI 05-7923, modification issued 1/08/08);  
 P003 - EDP sanding (PTI 05-7923, modification issued 1/08/08);  
 P004 - surfacer sanding (PTI 05-7923, modification issued 1/08/08);  
 P006 - process welding and related operations (PTI 05-7923, modification issued 1/08/08);  
 P014 - on-line repair sanding (PTI 05-7923, modification issued 1/08/08);  
 P015 - final inspection dynamometer (PTI 05-10022, issued 4/26/00);  
 P016 - topcoat inspection sanding (PTI 05-7923, modification issued 1/08/08);  
 P017 - inspection sanding (PTI 05-7923, modification issued 1/08/08);  
 P018 - WE sealer wipe (PTI 05-6431, issued 8/28/01);  
 P020 - BPA polish (PTI 05-10278, modification issued on 12/04/07);  
 P023 - stamping transfer press (PTI 05-9074, issued 6/3/99);  
 Z136 - Wheelabrator (exempt per OAC rule 3745-31-03);  
 B001- No. 1 Steam Boiler (exempt per OAC rule 3745-31-03);  
 B002- No. 2 Steam Boiler (exempt per OAC rule 3745-31-03); and  
 B003- No. 3 Steam Boiler (exempt per OAC rule 3745-31-03).

8. For the purposes of this permit, references to particulate emissions (PE) refers to the definition in OAC rule 3745-17-01(B)(11). Per OAC rule 3745-17-11, PE is defined as, "particulate matter measurable by the applicable test methods in 'Appendix A' of 40 CFR Part 60 'Standards of Performance for New Stationary Sources,' as such appendix existed on July 1, 1996."
9. The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached):

K015; and  
P020

All of the requirements of Subpart PPPP are specified in Attachment A. Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart PPPP (which is only available in PDF format) into Part II of this Title V permit was not possible. Numerous difficulties were encountered in attempting to copy and paste from a PDF format into STARS format.

10. The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart IIII--Automobile and Light-Duty Truck Surface Coating (see attached):

K001;  
K002;  
K003;  
K005;  
K006;  
K007;  
K008;  
K009;  
K011;  
K012;  
K013; and  
K024.

All of the requirements of Subpart PPPP are specified in Attachment A. Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart PPPP (which is only available in PDF format) into Part II of this Title V permit was not possible. Numerous difficulties were encountered in attempting to copy and paste from a PDF format into STARS format.

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**b State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

T003 - non-volatile material storage tank and dispensing;  
T004 - non-volatile material storage tank and dispensing;  
T014 - non-voltil. material storage tank and dispensing;  
Z022 - refrigerant pressurized storage tank distrn. system;  
Z027 - wastewater treatment plant;  
Z028 - water plant lime silo;  
Z029 - paint test lab;  
Z049 - BPA paint mini-spray booth;  
Z128 - anti-spatter blue coat;  
Z129 - reject repair area;  
Z131 - silo 1;  
Z132 - silo 2;  
Z133 - silo 3;  
Z134 - silo 4;  
Z135 - PA New Model Development, On-line Repair and Testing Painting Activities.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0546000117 Emissions Unit ID: B004 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas/No. 2 oil-fired 16.875 mmBtu/hr;	OAC rule 3745-31-05(A)(3)	0.60 ton particulate emissions (PE) per year
hot water boiler No. 1 (B004)	(PTI # 05-3835)	5.54 tons nitrogen oxides (NOx) per year
		4.65 tons carbon monoxide (CO) per year
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.
2. The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
3. The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
  - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
  - b. sulfur content of 0.5%.

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**III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information for this emissions units:
  - a. the amount of No. 2 fuel oil consumed, in gallons;
  - b. the amount of natural gas consumed, in million cubic feet;

- c. the PE rate, in tons, calculated as follows:
- i. for natural gas consumption, multiply A.III.2.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
  - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
  - iii. sum A.III.2.c.i + A.III.2.c.ii, and then divide by 2000.
- d. the NOx emission rate, in tons, calculated as follows:
- i. for natural gas consumption, multiply A.III.2.b by the emission factor of 100 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
  - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 20 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
  - iii. sum A.III.2.d.i and A.III.2.d.ii, and then divide by 2000.
- e. the CO emission rate, in tons, calculated as follows:
- i. for natural gas consumption, multiply A.III.2.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
  - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
  - iii. sum A.III.2.e.i and A.III.2.e.ii, and then divide by 2000.
- a. Based on the oil analyses required in sections II.A.3 and 4 of this permit, the permittee shall calculate the sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and CO emissions for this emissions unit. The submission of the annual fee emission report shall fulfill this reporting requirement. The annual fee emission report is due by April 15 of each year and covers the previous calendar year.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-3835: A.III.1 thru 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input  
  
Applicable Compliance Method:  
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).
  - b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:  
1.6 lb SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in Section A.III.3 of this permit.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

- d. Emission Limitation:  
0.60 TPY of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month PE rates.

- e. Emission Limitation:  
5.54 TPY of NO<sub>x</sub>

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month NO<sub>x</sub> emission rates..

- f. Emission Limitation:  
4.65 TPY of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month CO emission rates.

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VI. **Miscellaneous Requirements**

1. Annual certification.
2. Annual certification.
3. Annual certification.
4. Annual certification.
5. Annual certification.

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0546000117 Emissions Unit ID: B005 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas/No. 2 oil-fired 16.875 mmBtu/hr;	OAC rule 3745-31-05(A)(3)	0.60 ton particulate emissions (PE) per year
hot water boiler No. 1 (B005)	(PTI # 05-3835)	5.54 tons nitrogen oxides (NOx) per year
		4.65 tons carbon monoxide (CO) per year

The requirements of this rule also include compliance

		with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.
<b>2. Additional Terms and Conditions</b>		
(a)	None	

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.
2. The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
3. The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
  - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
  - b. sulfur content of 0.5%.

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**III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information for this emissions units:
  - a. the amount of No. 2 fuel oil consumed, in gallons;
  - b. the amount of natural gas consumed, in million cubic feet;
  - c. the PE rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.c.i + A.III.2.c.ii, and then divide by 2000.
  - d. the NOx emission rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 100 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 20 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.d.i and A.III.2.d.ii, and then divide by 2000.
  - e. the CO emission rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.e.i and A.III.2.e.ii, and then divide by 2000.
- a. Based on the oil analyses required in sections II.A.3 and 4 of this permit, the permittee shall calculate the sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that

- shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
  3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and CO emissions for this emissions unit. The submission of the annual fee emission report shall fulfill this reporting requirement. The annual fee emission report is due by April 15 of each year and covers the previous calendar year.
  4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-3835: A.III.1 thru 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input  
  
Applicable Compliance Method:  
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).
  - b. Emission Limitation:  
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
  - c. Emission Limitation:  
1.6 lb SO2/mmBtu of actual heat input  
  
Applicable Compliance Method:  
When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in Section A.III.3 of this permit.  
  
When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.  
  
If required, the permittee shall demonstrate compliance with the SO2 emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.
  - d. Emission Limitation:  
0.60 TPY of PE  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month PE rates.
  - e. Emission Limitation:  
5.54 TPY of NOx  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month NOx emission rates..
  - f. Emission Limitation:  
4.65 TPY of CO

## Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month CO emission rates.

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VI. **Miscellaneous Requirements**

1. Annual certification.
2. Annual certification.
3. Annual certification.
4. Annual certification.
5. Annual certification.

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Facility ID: 0546000117 Emissions Unit ID: B005 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: B006 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas/No. 2 oil-fired 16,875 mmBtu/hr; hot water boiler No. 1 (B006)	OAC rule 3745-31-05(A)(3) (PTI # 05-3835)	0.60 ton particulate emissions (PE) per year  5.54 tons nitrogen oxides (NOx) per year  4.65 tons carbon monoxide (CO) per year
	OAC rule 3745-17-10(B)(1) OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).  0.020 lb PE per mmBtu of actual heat input Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.
- 2. The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
- 3. The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
  - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
  - b. sulfur content of 0.5%.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 2. The permittee shall maintain monthly records of the following information for this emissions units:

- a. the amount of No. 2 fuel oil consumed, in gallons;
  - b. the amount of natural gas consumed, in million cubic feet;
  - c. the PE rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.c.i + A.III.2.c.ii, and then divide by 2000.
  - d. the NOx emission rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 100 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 20 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.d.i and A.III.2.d.ii, and then divide by 2000.
  - e. the CO emission rate, in tons, calculated as follows:
    - i. for natural gas consumption, multiply A.III.2.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
    - ii. for No. 2 fuel oil consumption, multiply A.III.2.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
    - iii. sum A.III.2.e.i and A.III.2.e.ii, and then divide by 2000.
- a. Based on the oil analyses required in sections II.A.3 and 4 of this permit, the permittee shall calculate the sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and CO emissions for this emissions unit. The submission of the annual fee emission report shall fulfill this reporting requirement. The annual fee emission report is due by April 15 of each year and covers the previous calendar year.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-3835: A.III.1 thru 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input  
  
Applicable Compliance Method:  
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).  
  
If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule

3745-17-03(B)(9).

- b. Emission Limitation:  
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:  
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:  
1.6 lb SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method:  
When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in Section A.III.3 of this permit.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

- d. Emission Limitation:  
0.60 TPY of PE

Applicable Compliance Method:  
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month PE rates.

- e. Emission Limitation:  
5.54 TPY of NO<sub>x</sub>

Applicable Compliance Method:  
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month NO<sub>x</sub> emission rates..

- f. Emission Limitation:  
4.65 TPY of CO

Applicable Compliance Method:  
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.2 of this permit and shall be the summation of the 12 calendar month CO emission rates.

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VI. **Miscellaneous Requirements**

1. Annual certification.
2. Annual certification.
3. Annual certification.
4. Annual certification.
5. Annual certification.

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**Facility ID: 0546000117 Emissions Unit ID: B006 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: B035 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B035 - Generator No. 2 (emergency and peak shaving)	OAC rule 3745-31-05(A)(3) (PTI 05-13448)	Nitrogen oxide (NOx) emissions shall not exceed 24.0 pounds per hour.  Carbon monoxide (CO) emissions shall not exceed 6.4

pounds per hour.

Volatile organic compound (VOC) emissions shall not exceed 0.6 pound per hour.

Particulate emissions (PE) shall not exceed 2.6 pound per hour.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 3.8 pounds per hour.

See A.II.1.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B)(5) and OAC rule 3745-31-05(C).

OAC rule 3745-31-05(C)

Carbon monoxide (CO) emissions shall not exceed 1.59 tons per rolling, 12-month summation.

Volatile organic compound (VOC) emissions shall not exceed 0.15 tons per rolling, 12-month summation.

Particulate emissions (PE) shall not exceed 0.68 tons per rolling, 12-month summation.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.95 tons per rolling, 12-month summation.

Nitrogen Oxides (NO<sub>x</sub>) emissions shall not exceed 6.0 tons per rolling, 12-month summation.

OAC rule 3745-17-07(A)(1)

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

OAC rule 3745-17-11(B)(5)(b)

PE shall not exceed 0.062 lb/mmBtu of actual heat input.

OAC rule 3745-18-06(G)

This unit is exempt per OAC rule 3745-18-06(B).

**2. Additional Terms and Conditions**

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.

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**II. Operational Restrictions**

- 1. The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation. (This company has sufficient records to begin demonstrating immediate compliance with this limitation. Therefore, it is not necessary to establish operating hour limitations for the first 12-months of operation after the effective date of this permit).
- 2. The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information for this emissions unit:
  - a. the total hours of operation for this emissions unit for each month; and
  - b. the rolling, 12-month summation of operating hours.
- 2. For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/MMBtu). The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

- 3. For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a

record of the type and quantity of fuel burned in this emissions unit.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports to Ohio EPA, Southwest District Office that identify the following:
  - a. each day when a fuel other than diesel fuel was burned in this emissions unit;
  - b. all exceedances of the rolling, 12-month hours of operation limitation.
  - c. all exceedances of the sulfur content restriction in II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions.

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**V. Testing Requirements**

1. Emission Limitations:
  - NOx - 24.0 lbs/hr and 6.0 tons/rolling, 12-month summation
  - CO - 6.4 lbs/hr and 1.59 tons/rolling, 12-month summation
  - VOC - 0.6 lb/hr and 0.15 tons/rolling, 12-month summation
  - PE - 2.7 lbs/hr and 0.68 tons/rolling, 12-month summation
  - SO2 - 3.8 lbs/hr and 0.95 tons/rolling, 12-month summation

Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 7.49 MMBTU/hr by the emission factor\* for each pollutant, from AP-42, Table 3.4-1.

\* for NOx, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO2, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix .

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton. If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

2. Visible Emissions Limitation:
 

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
3. Emission Limitation:
 

0.062 lb PE/mmBtu

Applicable Compliance Limit:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: B035 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0546000117 Emissions Unit ID: B409 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B409 - Generator No. 3 (emergency and peak shaving)	OAC rule 3745-31-05(A)(3) (PTI 05-13448)	Nitrogen oxide (NOx) emissions shall not exceed 28.5 pounds per hour.  Carbon monoxide (CO) emissions shall not exceed 7.64 pounds per hour.  Volatile organic compound (VOC) emissions shall not exceed 0.7 pound per hour.  Particulate emissions (PE) shall not exceed 3.2 pound pers hour.  Sulfur dioxide (SO2)emissions shall not exceed 4.5 pounds per hour.  See A.II.1.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B)(5) and OAC rule 3745-31-05 (C).  Nitrogen Oxides (NOx) emissions shall not exceed 7.12 tons per rolling, 12-month summation.  Carbon monoxide (CO) emissions shall not exceed 1.9 tons per rolling, 12-month summation.  Volatile organic compound (VOC) emissions shall not exceed 0.18 tons per rolling, 12-month summation.  Particulate emissions (PE) shall not exceed 0.8 tons per rolling, 12-month summation.  Sulfur dioxide (SO2)emissions shall not exceed 1.13 tons rolling, 12-month summation.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06(G)	This unit is exempt per OAC rule 3745-18-06(B).

**2. Additional Terms and Conditions**

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.

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**II. Operational Restrictions**

- 1. The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation. (This company has sufficient records to begin demonstrating immediate compliance with this limitation. Therefore, it is not necessary to establish operating hour limitations for the first 12-months of operation after the effective date of this permit).
- 2. The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for this emissions unit:
  - a. the total hours of operation for this emissions unit for each month; and
  - b. the rolling, 12-month summation of operating hours.
2. For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/MMBtu). The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
 

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.
3. For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to Ohio EPA, Southwest District Office that identify the following:
  - a. each day when a fuel other than diesel fuel was burned in this emissions unit;
  - b. all exceedances of the rolling, 12-month hours of operation limitation.
  - c. all exceedances of the sulfur content restriction in II.2.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions.

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#### V. Testing Requirements

1. Emission Limitations:
  - NO<sub>x</sub> - 28.5 lbs/hr and 7.1 tons/rolling, 12-month summation
  - CO - 7.64 lbs/hr and 1.9 tons/rolling, 12-month summation
  - VOC - 0.7 lb/hr and 0.18 tons/rolling, 12-month summation
  - PE - 3.2 lbs/hr and 0.8 tons/rolling, 12-month summation
  - SO<sub>2</sub> - 4.5 lbs/hr and 1.13 tons/rolling, 12-month summation

Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 8.91 MMBTU/hr by the emission factor\* for each pollutant, from AP-42, Table 3.4-1.

\* for NO<sub>x</sub>, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO<sub>2</sub>, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix .

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton. If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

2. Visible Emissions Limitation:
 

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
3. Emission Limitation:

0.062 lb PE/mmBtu

Applicable Compliance Limit:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: B409 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0546000117 Emissions Unit ID: F096 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F096-Paved and Unpaved Roadways and Parking areas (See section A.I.2.a. and b.)	OAC rule 3745-31-05(A)(3) (PTI 05-8339)	Particulate emissions (PE) shall not exceed 23.22 tons per year.  Particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM10) shall not exceed 5.25 tons per year.  There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.  There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.I.2.c, d, e, f, g, h, i, and j.).
	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	none (See A.I.2.k.)

**2. Additional Terms and Conditions**

- a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

- (a)
  - ID 1 - Truck entrance
  - ID 2 - South truck dock area
  - ID 3 - Container storage yard
  - ID 4 - Associate entrance drive
  - ID 5 - Associate parking
  - ID 6 - Test track
  - ID 7 - Brake test area
  - ID 8 - North truck dock area
  - ID 9 - Access road to east side
  - ID 10 - Access road to north side
  - ID 11 - AQG building FTZ parking
  - ID 12 - AQG associate parking lot
  - ID 13 - Gas plaza
  - ID 14 - AH car storage
  - ID 15 - AH entry drive
  - ID 16 - AH truck staging
  - ID 17 - AH railcar staging

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

- ID U1 - Rapp-Dean Road (behind ELP)

## ID U2 - Access to sub-station

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ vacuum assisted sweeping for the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved shoulders as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved roadway and parking area as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. The permittee shall require operators of open-bodied vehicles transporting materials likely to become airborne to keep such materials covered if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- k. This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. Except as otherwise specified in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
  - a. for all paved roadways and parking areas, as identified in Section A.I.2.a., the minimum inspection frequency shall be weekly; and
  - b. for all unpaved roadways and parking areas, as identified in Section A.I.2.b., the minimum inspection frequency shall be weekly.

After the permittee has performed weekly inspections of the paved and the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved and the unpaved roadways and parking areas once per

- month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section A.III
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
  3. The permittee shall maintain records of the following information:
    - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
    - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
    - c. the dates the control measures were implemented; and
    - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 3.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
  4. Reconfiguration of the roadways and parkways areas and variations in traffic patterns at this facility may not be a modification under OAC rule 3745-31-01 as long as emissions are equal to or less than the established PTI limitations. If the change is determined to be a modification then the permittee must apply for and obtain a permit to install prior to the installation of the change.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each instance when an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:  
If required, compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
  - b. Emission Limitation:
 

PE shall not exceed 23.22 tons per year.

PM10 shall not exceed 5.25 tons per year.

Applicable Compliance Method:  
Compliance may be determined by summing each of the paved and unpaved roadway and parking segments using the following procedure for each segment: multiply the emission factor, E, by the total annual vehicle miles traveled. The emission factor, E, shall be determined by the following equation

found in AP-42 section 13.2.1.3 (equation 2) for Paved Roads (dated October 2002), and draft section 13.2.2 (equation 1a) for Unpaved Roads (dated October 2001).

Paved Roads:  $E = k(sL/2)0.65 (W/3)^{1.5} (1-P/4N)^*$

where,

- E = particulate emission factor (pounds/VMT)
- k = constant - 0.082 for PE and 0.016 for PM10 (particle size multiplier for pounds/VMT)
- sL = road surface silt loading (g/m2)
- W = mean vehicle weight in tons
- P = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.1-2, AP-42, section 13.2.1)
- N = number of days in the averaging period = 365 days/year

Unpaved Roadways  $E = k(s/12)a(W/3)^b [(365 - p)/365]^*$

where,

- E = size-specific particulate emission factor (lb/VMT)
- k = constant - 4.9 for PE and 1.5 for PM10 (particle size multiplier for pounds/VMT)
- s = surface material silt content
- W = mean vehicle weight in tons
- a = constant - 0.7 for PE and 0.9 for PM10
- b = constant - 0.45 for both PE and PM10
- p = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.2-1, AP-42, section 13.2.2)

\* Because control methods are required as best available technology, additional control efficiencies may be included in the above calculations to determine particulate emissions.

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VI. **Miscellaneous Requirements**

1. Annual
2. Annual
3. Annual certification.

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Facility ID: 0546000117 Emissions Unit ID: F096 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
EDP Coating Line (K001), equipped with a thermal incinerator (EDP)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	Volatile organic compound (VOC) emissions shall not exceed 0.062 kg/liter (0.52 lb/gallon) of applied solids, as a monthly, volume-weighted average.  23.25 lbs VOC per hour  See A.I.2.a, b, c, and d.  emissions from natural gas combustion in the drying oven and the incinerator:  0.05 lb PM10/hr 0.06 lb SO2/hr 1.00 lb NOx/hr 0.81 lb CO/hr 0.05 lb VOC/hr  See A.I.2.f.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).

40 CFR Part 60, Subpart MM	The VOC emission limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)(1)	The VOC content limitation required by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	None (see A.I.2.g)
OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	None (see A.I.2.h)
OAC rule 3745-17-10(B) (for the indirect-fired ovens associated with this emissions unit)	The PE limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (for indirect-fired ovens associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.  Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.  (see Section Part A.II.4. and Part A.III.6)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 23.25 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. All the VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC .
- e. In order to comply with the requirements 40 CFR Part 63.3091, K001 must demonstrate compliance with one of following limits/controls:
  - i. Combined organic HAP emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems must not exceed 0.072 kg/liter (0.60 lbs/gal) of coating solids deposited during each month, determined according to the requirements in 40 CFR Part 63.3161.
  - ii Each individual material added to the eletrodeposition primer system must contain no more than;
    - (a) 1.0 percent by weight of any organic HAP; and
    - (b) 0.10 percent by weight of any organic HAP, which is an Occupational Safety and Health Administrative (OSHA) defined carcinogen as specified in 29 CFR Part 1910.1200(d)(4).
  - iii Emissions from all bake ovens used to cure eletrodeposition primers must be captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent.
- f. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- g. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment

associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- h. The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
3. The permittee shall burn only natural gas in this emissions unit.
4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units, units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder 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:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain the following monthly records on all materials employed in this emissions unit:
  - a. the name and identification number of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon;
  - c. the volume, in gallons, of each material employed;
  - d. the total VOC generated, in pounds per month (the summation of all materials employed ("b" x "c");
  - e. the solids content of each material employed, in percent by volume;
  - f. the amount of solids applied, in gallons per month [(c x e) x transfer efficiency];
  - g. the amount of VOC captured, in percent by weight (based on the best available data, or the most recent stack test results);
  - h. the total amount of VOC vented to the control system, in pounds per month (the summation of "d" x "g");
  - i. the total controlled emissions, in pounds per month (the summation of "h" x (1- destruction efficiency), from the most recent stack test);

- j. the total amount of VOC emitted, in pounds per month ("d" -"h") + "i");
  - k. the amount of VOC emitted, in pounds per gallon of solids applied ( "j" /"f"); and
  - l. the amount of VOC emitted, in kg per liter of applied solids ("k" x 0.1198).
4. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
    - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
    - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
    - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
  5. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
    - a. the name and identification number of each volatile liquid organic cleanup material employed;
    - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
    - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
    - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
    - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
    - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  6. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. volatile organic compound (VOC) emissions exceed 0.062 Kg/liter (0.52 lb/gallon) of applied solids, as a monthly, volume-weighted average;
  - b. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - c. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. 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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall 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.
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
- 0.062 kg VOC per liter of applied solids, as a monthly, volume-weighted average (0.52 lb VOC/gallon of applied solids)
- Applicable Compliance Method:
- Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.3. of this permit.
- b. Emission Limitation:
- 1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials
- Applicable Compliance Method:
- Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.
- c. Emission Limitations:
- 38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined
- 103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined
- Applicable Compliance Method:
- Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.5, of this permit.
- d. Emission limitation:
- 23.25 lbs VOC/hr
- Applicable Compliance Method:
- Compliance with the hourly allowable VOC emission limitation may be determined as follows:
- $$HER = \{(Mu \times VC) \times Ce\} \times (1-De) + \{(Mu \times VC) \times (1-Ce)\}$$
- where:
- HER = maximum VOC emissions (lbs/hr);  
 Mu = maximum potential material usage per hour, in gallons;  
 VC = maximum VOC content of each material used, in pounds per gallon;  
 Ce = capture efficiency (based on best available data); and  
 De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).
- If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
- e. Visible Emission Limitation:
- Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
- If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
- f. Emission Limitations:
- 0.05 lb PM10/hr  
 0.06 lb SO2/hr  
 1.00 lb NOx/hr  
 0.81 lb CO/hr  
 0.05 lb VOC/hr
- Applicable Compliance Method:
- The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (9,636 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.
- \* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for

VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix .

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM<sub>10</sub>

g. Emission Limitations:

The thermal oxidizer shall operate at a minimum VOC destruction efficiency of 90 percent, by weight.

Applicable Compliance Method:

Compliance with the VOC destruction efficiency requirements above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

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

a. Destruction efficiency and capture efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The following test methods shall be employed to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

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.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the test(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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - sealer/deadner coating line with thermal incinerator controls	OAC rule 3745-31-05(A)(3) (PTI 05-13872)	<p>Volatile organic compound (VOC) emissions shall not exceed 14.1 lbs per hour (see A.I.2.d below.)</p> <p>See A.I.2.a, b, and c below.</p> <p>Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator :</p> <p>0.06 lb PE(filterable)/hr                      0.02 lb SO<sub>2</sub>/hr                      3.3 lbs NO<sub>x</sub>/hr                      2.8 lbs CO/hr                      0.2 lb VOC/hr                      See A.I.2.e below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-21-09(U) and 3745-23-06(B).</p>
	OAC rule 3745-21-09(U)(1)(i)	The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the fuel burning equipment associated with this emissions unit).
	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.f below.)
	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.g below.)
	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.
		Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
		(see Section Part A.II.5. and Part A.III.4)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

- d. The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The hourly natural gas emission limitations are based on potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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#### II. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
- 5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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#### III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder 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:

  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 2. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents;
  - c. the amount of each coating employed, in gallons per month, excluding water and exempt solvents;
  - d. the VOC regreathed from each coating, in tons per month (the summation of [{"b" x "c"} / 2000 lbs/ton]);
  - e. the total VOC regreathed by all coating employed in this emissions unit, in tons per month (the summation of all "d" for all coating employed in this emissions unit);
  - f. the total controlled VOC emissions, for all the coatings employed, in tons per month (the summation of [{"e" x the capture efficiency} x (1 - the control efficiency)] + [{"e" x (1 - the capture efficiency)}]);

- g. the rolling, 12-month total combined VOC emitted from this emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("f") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
5. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
6. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

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#### 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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.
3. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing an exceedance of the VOC content limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Southwest District Office within thirty (30) days after the exceedance occurs.
4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:
 

3.0 lbs VOC/gallon of coating, excluding water and exempt solvent, as applied

Applicable Compliance Method:

Compliance with the mass VOC per volume of coating limitations shall be determined through the record keeping requirements established in Sections A.III.3. of this permit.
  - b. Emission Limitation:
 

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.6.c.

- c. Emission Limitations:
- 38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.
- 103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.
- Applicable Compliance Method:
- Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.5.e. and f., respectively.
- d. Emission Limitations:
- 0.06 lb PE (filterable)/hr  
0.02 lb SO<sub>2</sub>/hr  
3.3 lbs NO<sub>x</sub>/hr  
2.8 lbs CO/hr  
0.2 lb VOC/hr
- Applicable Compliance Method:
- The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (32,353 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.
- \* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM<sub>10</sub>, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.
- If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix .
- \*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.
- \*\*\* All PE is assumed to be PM<sub>10</sub>
- e. Emission limitation:
- 14.1 lbs VOC/hr
- Applicable Compliance Method:
- Compliance with the hourly allowable VOC emission limitation may be determined as follows:
- $$E_h = (VOC_u \times Be) + \{[VOC_u \times (1 - Be)] \times (1 - De)\}$$
- where:
- HER = maximum Hour Emission Rate, in lbs of VOC per hour;  
VOC<sub>u</sub> = the maximum VOC usage of 60.01 pounds (this is based upon maximum usage and maximum VOC content for both the sealer materials and deadner materials);  
Be = the maximum uncaptured emissions from the booth based upon engineering estimates of 15% or 0.15; and  
De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).
- If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
- f. Emission Limitation:
- The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart IIII 63.3091 as of the applicable compliance date detailed in that subpart.
- Applicable Compliance Method:
- As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall demonstrate compliance using the applicable methods detailed in 63.3150 through 63.3152 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
  - The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.

- c. The following test methods shall be employed to demonstrate compliance:
- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
  - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
  - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
  - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
  - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.
4. Based upon the analytical test results of the deadner and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 85%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

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VI. **Miscellaneous Requirements**

1. Annual certification.
2. Annual certification.
3. Annual certification.
4. Annual certification.
5. Annual certification.
6. Annual certification.

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K002 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 Guidecoat Line	OAC rule 3745-31-05(A)(3) (PTI	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of

05-7923)	<p>applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007.</p> <p>149.9 lbs VOC per hour .</p> <p>5.4 pounds of particulate emissions (PE) per hour, from overspray.</p> <p>emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.20 lb PM10/hr 0.02 lb SO2/hr 4.05 lbs NOx/hr 3.40 lbs CO/hr 0.21 lb VOC/hr</p> <p>See A.I.2.e.</p>
OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B) (from overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.f)
OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.g)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- d. The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting

requirements to ensure compliance with this limit.

- e. The emission limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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#### II. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- 5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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#### III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder that which measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder 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:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
- b. 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 maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
- 3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for

the 11 previous calendar months).

4. The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
  - a. the name and identification number of each coating;
  - b. the amount of each coating employed, in gallons per month;
  - c. the VOC content of each coating employed, in pounds of VOC per gallon;
  - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
6. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed; and
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

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#### 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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall 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.
4. The permittee shall submit quarterly deviation reports that identify all times when the down draft scrubber control was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;
  - b. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - c. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
6. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

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

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3., of this permit.

d. Emission Limitations:

5.4 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

e. Emission Limitations:

0.20 lb PM10/hr  
0.02 lb SO2/hr  
4.05 lbs NOx/hr  
3.40 lbs CO/hr  
0.21 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

f. Emission limitation:

149.9 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents;

Ce = capture efficiency (as determined during the most recent compliance demonstration); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance demonstration).

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- g. Emission Limitation:
- Visible PE from overspray associated with this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
- Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
- If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
  - b. Destruction efficiency testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
  - c. The following test methods shall be employed to demonstrate compliance:
    - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
    - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
    - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
    - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
    - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).
- Personnel from Ohio EPA, Southwest District Office 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.
- 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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.
3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of

the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0546000117 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat, coating line A (K005), equipped with a thermal incinerator (T/C A)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	214.64 lbs volatile organic compounds (VOC) per hour
		10.8 pounds of particulate emissions (PE) per hour, from overspray
		See A.I.2.a, b, and c.
		emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:
		0.26 lb PM10/hr 0.031 lb SO2/hr 5.13 lbs NOx/hr 4.31 lbs CO/hr 0.27 lb VOC/hr See A.I.2.e.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1) (c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B) (from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).	
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).	
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.	
40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts	

63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

## 2. Additional Terms and Conditions

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- d. The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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### II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
3. The permittee shall burn only natural gas in this emissions unit.
4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of

- 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."
2. The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
    - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
    - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
    - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
  3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
    - a. the name and identification number of each volatile liquid organic cleanup material employed;
    - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
    - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
    - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
    - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
    - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
  5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
  6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.
  7. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder 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:

    - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
    - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall 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.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the

downdraft/scrubber control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.

5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1.n. of this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3.c. of this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4.e and f., respectively, of this permit.

d. Emission Limitations:

0.26 lb PM10/hr  
0.031 lb SO<sub>2</sub>/hr  
5.13 lbs NO<sub>x</sub>/hr  
4.31 lbs CO/hr  
0.27 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission limitation:

214.64 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

HER =  $\{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

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

a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and

Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0546000117 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat, coating line B (K006), equipped with a thermal incinerator (T/C A)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	214.64 lbs volatile organic compounds (VOC) per hour  10.8 pounds of particulate emissions (PE) per hour, from overspray  See A.I.2.a, b, and c.  emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:  0.26 lb PM10/hr 0.031 lb SO2/hr 5.13 lbs NOx/hr 4.31 lbs CO/hr 0.27 lb VOC/hr See A.I.2.e.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1) (c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B) (from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids,

OAC rule 3745-21-09(C)(1)(c)	as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined). 15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- d. The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.
7. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder 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:

  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall 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.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the downdraft/scrubber control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1.n. of this permit.
  - b. Emission Limitation:
 

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3.c. of this permit.
  - c. Emission Limitations:
 

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4.e and f., respectively, of this permit.
  - d. Emission Limitations:
 

0.26 lb PM10/hr  
0.031 lb SO2/hr  
5.13 lbs NOx/hr  
4.31 lbs CO/hr  
0.27 lb VOC/hr

## Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

## e. Emission limitation:

214.64 lbs VOC per hour

## Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

HER = maximum Hour Emission Rate, in pounds per hour;  
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;  
VC = maximum coating VOC content, in pounds per gallon;  
Ce = capture efficiency (as determined during the most recent compliance test); and  
De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

## f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

## Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

## g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

## Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
Mcu = Maximum Hourly Coating Usage, gallons per hour;  
Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
Te = Latest Transfer Efficiency results, in percentage transferred; and  
Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

## h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

## Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

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

- a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
- b. The emissions testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- c. The following test methods shall be employed to demonstrate compliance:
- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
  - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
  - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
  - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
  - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primary topcoat on-line repair (K007)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	89.3 lbs volatile organic compounds (VOC) per hour.  VOC emissions shall not exceed 1.06 kgs/liter (8.85 lbs/gallon) of applied solids, as a daily, volume-weighted average [from all primer/surfacer coating operations (emissions units K003 and K007).

5.19 pounds of particulate emissions (PE) per hour, from overspray

See Sections A.I.2.a, b, and c.

emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following:

- 0.21 lb PM10/hr
- 0.025 lb SO2/hr
- 4.08 lbs NOx/hr
- 3.43 lbs CO/hr
- 0.22 lb VOC/hr

See Section A.I.2.d.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(C)(1)(c), and 40 CFR, Part 60, Subpart MM

OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rules 3745-17-11(C)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
40 CFR, Part 60, Subpart MM, 60.392(b)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
OAC rule 3745-21-09(C)(1)(a)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.e)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 89.3 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

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#### II. Operational Restrictions

- 1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 2. The permittee shall burn only natural gas in this emissions unit.
- 3. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- 4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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#### III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- 2. The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
  - a. the name and identification number of each coating;
  - b. the amount of each coating employed, in gallons per month;
  - c. the VOC content of each coating employed, in pounds of VOC per gallon;
  - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

- 3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

- c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
- the name and identification number of each volatile liquid organic cleanup material employed;
  - the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
- the combined daily volume weighted average VOC emissions from the use of primer/surfacer in emission units K003 and K007 exceed 1.06 kgs/liter (8.85 lbs/gallon) of applied solids;
  - the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;
  - the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
 

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - Emission Limitation:
 

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3., of this permit.
  - Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4, respectively, of this permit.

d. Emission Limitations:

0.21 lb PM10/hr  
0.025 lb SO2/hr  
4.08 lbs NOx/hr  
3.43 lbs CO/hr  
0.22 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission limitation:

89.3 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$HER = Cu \times VC$

where:

HER = maximum Hour Emission Rate, in pounds per hour;  
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and  
VC = maximum coating VOC content, in pounds per gallon;

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

5.19 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$

where:

HER = Hour Emission Rate, lbs per hour;  
 Msc = Maximum Hourly Coating Usage, gallons per hour;  
 Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
 Te = Latest Transfer Efficiency results, in percentage transferred; and  
 Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined]

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

i. Emission Limitation:

1.06 kg of VOC/liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average (from the use of primer/surfacer in emissions units K003 and K007, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0546000117 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: K008 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Secondary topcoat on-line repair (K008)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	8.7 lbs volatile organic compounds (VOC) per hour  0.42 pounds of particulate emissions (PE) per hour, from overspray  See Sections A.I.2.a, b, and c.  emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following:  0.21 lb PM10/hr 0.025 lb SO2/hr 4.08 lbs NOx/hr 3.43 lbs CO/hr 0.22 lb VOC/hr  See Section A.I.2.d.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(C)(1)(c),

OAC rule 3745-17-07(A)(1)	40 CFR, Part 60, Subpart MM. Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rules 3745-17-11(C)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.e)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 8.7 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

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**II. Operational Restrictions**

- 1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 2. The permittee shall burn only natural gas in this emissions unit.

3. The permittee shall operate a filter control system whenever this emissions unit is in operation.
4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."
2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
6. The permittee shall maintain records that document any time periods when the filter control system serving this emissions unit was not in service while this emissions unit was operating.

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;
  - b. the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - c. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR

Parts 63.3110 through 63.3176.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. 15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)
 

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:
 

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2., of this permit.
  - c. Emission Limitations:
 

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3, respectively, of this permit.
  - d. Emission Limitations:
 

8.7 pounds of VOC per hour

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = M_{cu} \times VOC_c$$

where:

HER = Hour Emission Rate, lbs per hour;  
 $M_{cu}$  = Maximum Hourly Coating Usage, gallons per hour; and  
 $VOC_c$  = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 24 or an appropriate alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.
  - e. Emission Limitation:
 

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established Section A.III.1. of this permit.
  - f. Emission Limitations:
 

0.42 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
 Mcu = Maximum Hourly Coating Usage, gallons per hour;  
 Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
 Te = Latest Transfer Efficiency results, in percentage transferred; and  
 Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitations:

0.21 lb PM10/hr  
 0.025 lb SO2/hr  
 4.08 lbs NOx/hr  
 3.43 lbs CO/hr  
 0.22 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Emissions Unit ID: K008 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Issuance type: Title V Preliminary Proposed Permit**

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**Facility ID: 0546000117 Emissions Unit ID: K009 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wax/Polish coating line (K009)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not

exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit. [this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(d)]

87.2 lbs VOC per hour

0.29 lb particulate emissions (PE) per hour, for over spray

See A.I.2.a and b.

emissions from natural gas combustion in the air supply houses:

0.07 lb PM10/hr  
 0.009 lb SO2/hr  
 1.49 lbs NOx/hr  
 1.25 lbs CO/hr  
 0.08 lb VOC/hr

See A.I.2.d.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(U)(2)(f) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.

- OAC rule 3745-17-07(A)(1) Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
- OAC rule 3745-17-11(B) The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) (for overspray).
- 40 CFR, Part 60, Subpart MM 1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoat employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
- OAC rule 3745-21-09(C)(1)(c) The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
- OAC rule 3745-18-06(E) The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
- OAC rule 3745-21-09(U)(2)(f) See A.I.2.g.
- OAC rule 3745-17-(11)(B) (for the air supply houses associated with this emissions unit) None (see A.I.2.e)
- OAC rule 3745-17-07(A) (for the air supply houses associated with this emissions unit) None (see A.I.2.f)
- 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176) The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 87.2 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this

emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

- d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the air supply houses were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- f. The PE from the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- g. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

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#### II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The permittee shall operate a filter control system whenever this emissions unit is in operation.
3. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."
2. The permittee shall maintain the following monthly records on all coatings other than topcoats employed in this emissions unit:
  - a. the name and identification number of each coat employed;
  - b. the amount of each coat employed, in gallons per month, excluding water and exempt solvents;
  - c. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents;
  - d. the calculated VOC generated from each coat employed, in pounds of VOC per month, (the summation of "b" x "c");
  - e. the combined VOC emissions from all of the non-topcoat coatings employed in this emissions unit, in pounds of VOC per month (the summation of "d" from all of the non-topcoat coatings employed in this emissions unit);
  - f. the combined non-topcoat coating usage employed in this emissions unit, in gallons per month, (summation of "b" from all of the non-topcoat coatings employed in this emissions unit); and
  - g. the volume weighted average VOC content of all non-topcoat coatings employed in this emissions unit, in pounds of VOC per gallon, excluding water and exempt solvents.
3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-

K012:

- a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
    - a. the name and identification number of each volatile liquid organic cleanup material employed;
    - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
    - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
    - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
    - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
    - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
  6. The permittee shall maintain the following monthly records on number of units processed through this emissions unit:
    - a. the number of units processed; and
    - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC content of the coatings employed in this emissions unit, excluding topcoat operations, exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit;
  - b. the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;
  - c. the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009\* and K012\*, combined].

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:
 

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3., of this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4., of this permit.

d. Emission Limitations:

The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitations shall be determined through the record keeping requirements established in Section A.III.2.

e. Emission Limitations:

0.29 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitations:

0.07 lb PM10/hr

0.009 lb SO2/hr

1.49 lbs NOx/hr

0.3 lbs CO/hr

0.08 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10.

g. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

- h. Emission Limitation:  
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
- Applicable Compliance Method:
- Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established Section A.III.1. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: K009 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: K011 Issuance type: Title V Preliminary Proposed Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Final repair (K011)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	Volatile organic compound (VOC) emissions shall not exceed 15.8 lbs per hour.  1.26 lbs of particulate emissions (PE) per hour  See A.I.2.a and b.  emissions from natural gas combustion:  0.04 lb PM10/hr 0.005 lb SO2/hr 0.85 lbs NOx/hr 0.72 lb CO/hr 0.05 lb VOC/hr  See A.I.2.d.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c).
	OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6 tons per rolling 12-month period.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
	OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-17-(11)(B) (for the oven associated with this emissions unit)	None (see A.I.2.e)

OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-07(A) (for the oven associated with this emissions unit)	None (see A.I.2.f)

2. **Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 15.8 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A) (2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- f. The PE for the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. **Operational Restrictions**

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
2. The permittee shall burn only natural gas in this emissions unit.
3. The permittee shall operate a filter control system whenever this emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain daily records that list the following information on the coatings employed in this emissions unit:
  - a. the name and identification number of each coating;
  - b. the number of gallons employed;
  - c. the VOC content, in pounds per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the daily volume weighted VOC content of all coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - f. the water and exempt solvents content, in percent by volume;
  - g. the nonvolatile (solids) content, in percent by volume; and
  - h. calculations showing the 12-month VOC emissions, in tons per rolling 12-month period.
2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

- c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
- 4. For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.
- 5. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed; and
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

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#### IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC content exceed 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average;
  - b. the VOC emissions from the use of coatings exceed 6.0 tons per rolling 12-month period;
  - c. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

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#### V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:
    - 4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average
    - Applicable Compliance Method:
    - Compliance shall be based upon the record keeping requirements established in section A.III.1. of this permit.
  - b. Emission Limitation:
    - 1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials
    - Applicable Compliance Method:
    - Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in section A.III.2. of this permit.
  - c. Emission Limitations:
    - 38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined
    - 103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined
    - Applicable Compliance Method:
    - Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.3., respectively, of this permit.
  - d. Emission Limitation:
    - 0.04 lb PM10/hr
    - 0.005 lb SO2/hr
    - 0.85 lbs NOx/hr

0.72 lb CO/hr  
0.05 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (8,525 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission limitation:

15.8 lbs VOC/hr

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = [Cu * VC]$$

where:

HER = maximum Hourly Emission Rate, in lbs of VOC/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

1.26 pounds PE/hr, from coating overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1-Te)] \times (1- Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission limitation:

6.0 tons of VOC per rolling 12-month period

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.1.

- i. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: K011 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Emissions Unit ID: K012 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Specialty coating operation (K012), equipped with a thermal incinerator (STC)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	17.4 lbs volatile organic compounds (VOC) per hour  0.5 pounds of particulate emissions (PE) per hour, from overspray  See A.I.2.a, b, and c.  emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:  0.14 lb PM10/hr 0.02 lb SO2/hr 2.85 lbs NOx/hr 2.40 lbs CO/hr 0.15 lb VOC/hr  See A.I.2.e.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1) (c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-11-09(B) (from the direct-fired oven zones associated with this emissions unit)	None (See A.I.2.f)
	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	None (See A.I.2.g)

OAC rule 3745-17-07(A)  
(from the indirect-fired oven zones associated with this emissions unit) Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176) The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The VOC emissions from the use of topcoats that are baked in this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.  
  
The requirement to vent emissions to a thermal oxidizer does not include emissions from any topcoat that is air-dried. Air-dry coatings are materials that do not require baking to fully cure and baking is not required to ensure the performance characteristics of the coatings.
- d. The 17.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3) (h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation and applying any topcoat that requires baking, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The permittee shall operate a filter control system whenever this emissions unit is in operation.
- 5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

- a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on all coatings used to coat miscellaneous metal parts in this emissions unit:
  - a. the name and identification number of each coat employed; and
  - b. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e. the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
7. The permittee shall maintain records that document any time periods when the filter control system serving this emissions unit was not in service while this emissions unit was operating.
8. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and applying any topcoat that requires baking. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder 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:

  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
9. The permittee shall maintain the following monthly records on all non-topcoat coating used to coat the surface of automobiles and light-duty trucks in this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
10. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period; and
  - f. the VOC content of coatings employed in coating miscellaneous metal parts in this emissions unit exceeds 3.0 lbs of VOC per gallon, minus water and exempt solvents.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall 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 and applying any topcoat that requires baking.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the filter control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1. of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3. of this permit.
  - c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4., of this permit.
  - d. Emission Limitations:

0.14 lb PM10/hr

0.02 lb SO<sub>2</sub>/hr  
 2.85 lbs NO<sub>x</sub>/hr  
 2.40 lbs CO/hr  
 0.15 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM<sub>10</sub>, 1.9 lbs PM<sub>10</sub>/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM<sub>10</sub>

e. Emission limitation:

17.4 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

where:

HER = maximum Hour Emission Rate, in pounds per hour;  
 Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;  
 VC = maximum coating VOC content, in pounds per gallon;  
 Ce = capture efficiency (as determined during the most recent compliance test); and  
 De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

0.5 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
 Mcu = Maximum Hourly Coating Usage, gallons per hour;  
 Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
 Te = Latest Transfer Efficiency results, in percentage transferred; and  
 Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

- 1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

2. If required 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 to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
  - b. The following test methods shall be employed to demonstrate compliance:
    - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
    - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
    - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
    - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
    - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Emissions Unit ID: K012 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: K013 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Miscellaneous Coating Line (including primer coating, miscellaneous metal parts coating, and miscellaneous solvent usage)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents, (this limitation is less

stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i), (see A.I.2.b).

The VOC emissions shall not exceed 19.6 pounds per hour nor 29.2 tons per rolling, 12-month summation, for all the coatings employed.

The organic compound (OC) emissions, from the use of liquid organic material, not involved in coating metal parts, shall not exceed 5.8 pounds per hour nor 9.98 tons per rolling, 12-month summation.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G), and 3745-21-09(U)(2)(f).

40 CFR, Part 60, Subpart MM (40 CFR 63.3080 - 3176)

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(see Section Part II.A.1.)

OAC rule 3745-21-09(U)(2)(f)

When coating miscellaneous metal parts, see A.I.2.b. and A.II.3)

OAC rule 3745-21-07(G)

When coating non-metal parts, see A.II.2.

**2. Additional Terms and Conditions**

- a. The 19.6 lbs VOC per hour limitation and the 5.8 lbs OC per hour limitation were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limits.
- b. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

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**II. Operational Restrictions**

- 1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 2. The permittee shall not employ any liquid organic material, except for those materials employed to coat metal parts, that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 3. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month for all the miscellaneous metal coatings employed for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (in lbs/gallon, excluding water and exempt solvents) of each coating, as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
  - d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B);
  - e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in gallons, of each coating employed (c), and sum the results for all the coatings employed; and
  - f. the rolling, 12-month VOC emissions for all the coatings employed, in tons.
- 2. The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
  - a. the name and identification number of each liquid organic material employed;
  - b. whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
  - c. the VOC and organic compound (OC) contents for each liquid organic material employed, in pounds per

gallon;

- d. the volume, in gallons, of each liquid organic material employed;
  - e. the total VOC and OC emission rates, in tons, per month;
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("e") plus the total amount of VOC emissions for the 11 previous calendar months); and
  - g. the rolling, 12-month total combined OC emitted from the above listed emissions units, in tons (the total individual OC emitted, in tons, for the current month ("e") plus the total amount of OC emissions for the 11 previous calendar months).
3. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
  4. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
    - a. the number of units processed; and
    - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents;
  - b. the VOC emissions exceed 29.2 tons per rolling, 12-month summation, for all the coatings employed; and
  - c. the organic compound (OC) emissions, from the liquid organic materials, not related to the metal coating operations in this emissions unit, exceed 9.98 tons per rolling, 12-month summation
2. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
3. The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

The VOC emissions from the coatings employed shall not exceed 19.6 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$HER = [Cu * VC]$$

where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;  
 Cu = the maximum potential coating usage rate, in gallons/hr; and  
 VC = the maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
  - b. Emission Limitation:
 

The OC emissions from the use of miscellaneous solvents employed shall not exceed 5.8 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$HER = [Su * VC]$$

where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;  
 Su = the maximum potential solvent usage rate, in gallons/hr; and  
 VC = the maximum solvent VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:
    - 29.2 tons VOC per rolling, 12-month summation, from the use of coatings.
    - Applicable Compliance Method:
      - Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements specified in Section A.III.1. of this permit.
  
  - d. Emission Limitation:
    - 9.98 tons OC per rolling, 12-month summation
    - Applicable Compliance Method:
      - Compliance with the annual allowable OC emission limitation shall be determined through the record keeping requirements specified in Section A.III.2. of this permit.
  
  - e. Emission Limitation:
    - 6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average, when coating miscellaneous metal parts.
    - Applicable Compliance Method:
      - Compliance with the VOC content limitation shall be determined through the record keeping requirements specified in Section A.III.1. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: K013 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0546000117 Emissions Unit ID: K015 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.	OAC rule 3745-31-05(A)(3) (PTI 05-10278)	3512 lbs VOC/day 172 lbs PM/day  Oven Emissions: 0.47 lb PM/hr, 2.04 TPY PM, 0.04 lb SO <sub>2</sub> /hr, 0.16 TPY SO <sub>2</sub> , 6.12 lbs NO <sub>x</sub> /hr, 26.8 TPY NO <sub>x</sub> , 5.14 lbs CO/hr, 22.51 TPY CO, 0.67 lb TOC/hr, 2.95 TPY TOC
	OAC rule 3745-31-05(C)	See A.2.a. below. 188 tons VOC per rolling, 12-month summation of the monthly emissions.  8.64 tons of PM per rolling 12-month summation of the emissions
	40 CFR 63 Subpart PPPP	See terms A.II.1., 2., 3. HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the

applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

See Section II

OAC rule 3745-21-07(G)

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

OAC rule 3745-17-10

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

OAC rule 3745-17-11

7.46 lb PM/hr

## 2. Additional Terms and Conditions

- a. The pound per day limitations for VOC and PM are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.

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## II. Operational Restrictions

1. The maximum material usage for this emissions unit shall not cause VOC emissions to exceed 188 tons per rolling 12-month period, calculated according to the following formula:

$$\text{AER} = \{[(C1 \times \text{OCc}1) + (C2 \times \text{OCc}2) + \text{etc...}] + [(S1 \times \text{OCs}1) + (S2 \times \text{OCs}2) + \text{etc...}] / 2000 \text{ lbs/ton}\} - (R / 2000 \text{ lbs/ton})$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
 C = usage of coating, in gallons;  
 S = usage of purge and cleanup solvent j, in gallons;  
 OCc = organic compound content of the coatings, in pounds per gallon;  
 OCs = organic compound content of the solvents, in pounds per gallon;  
 R = amount of OC recovered in the purge system, in pounds; and  
 1, 2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

2. The maximum material usage for this emissions unit shall not cause PM emissions to exceed 8.64 tons per rolling 12-month period, calculated according to the following formula:

$$\text{AER} = \{([(C1 \times D1 \times S\%1) + (C2 \times D2 \times S\%2) + \text{etc...}] \times (1-TE)) \times (1-RE)\} / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
 C = usage of coating, in gallons;  
 D = density of coating, in pounds per gallons;  
 S% = non-volatile percentage (solids) of coating i, in percent by weight;  
 TE = transfer efficiency of the coating onto the substrate (%);  
 RE = particulate removal efficiency of the underbooth waterwash system (%); and  
 1, 2, etc.. = individual coating, density, and specific OC content for each coating.

3. In accordance with 40 CFR Part 63, Subpart PPPP, the permittee shall employ material complaint with the HAP emissions limitations as outlined in 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.
4. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual particulate matter emissions, based upon a 12-month summation of the monthly emissions:

- a. the company identification for each coating employed;
- b. the number of gallons of each coating employed;
- c. the density of each coating, in pounds per gallon;
- d. the non-volatile percentage (solids) of each coating, in percent by weight; and
- e. the rolling, 12-month summation of the total PM emissions, according to the formula in A.II.3.

2. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:

- 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 volatile organic compound content of each coating and cleanup material, in pounds per gallon; and
- d. the rolling, 12-month summation of the total controlled VOC emissions, according to the formula in A.II.2.

3. The permittee shall collect and maintain all applicable records in accordance with the requirements of 40 CFR Part 63, Subpart PPPP and in a manner to demonstrate continual compliance with the HAP emissions limitations as defined in 40 CFR 63.4490, or the applicable record keeping requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC emissions exceed 188 tons per rolling 12-month period;
  - b. the particulate emissions exceed 8.64 tons per rolling 12-month period; and
  - c. Any exceedance of the applicable HAP emissions limitations as defined in 40 CFR Part 63.4490, or any exceedance of the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.
2. The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:
 

188 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section A.III.2.d. of this permit.
  - b. Emission Limitation:
 

Emissions of PM from this emission unit shall not exceed 8.64 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section A.III. 1.e of this permit.
  - c. Emission Limitation:
 

7.46 lbs PM/hr - Overspray

Applicable Compliance Method:

Compliance with the hourly over-spray particulate emission limitation shall be determined using the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
 Mcu = Maximum Hourly Coating Usage, gallons per hour;  
 Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
 Te = Latest Transfer Efficiency results, in percentage transferred; and  
 Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
  - d. Emission Limitation:
 

0.47 lb PM/hr, 2.04 TPY PM,  
 0.04 lb SO<sub>2</sub>/hr, 0.16 TPY SO<sub>2</sub>,  
 6.12 lbs NO<sub>x</sub>/hr, 26.8 TPY NO<sub>x</sub>,  
 5.14 lbs CO/hr, 22.51 TPY CO,  
 0.67 lb TOC/hr, 2.95 TPY TOC

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (61,200 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and

1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission Limitation:

HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

Applicable Compliance Method:

The permittee shall demonstrate compliance using the applicable requirements as detailed in 40 CFR Part 60 Subpart PPPP, 63.4540 through 63.4568 or the applicable requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: K015 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.	OAC Rule 3745-114-01	Ohio Toxic Policy

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. This emissions unit shall be equipped with an overspray control system that will minimize or eliminate particulate emissions from this emissions unit. The control system shall be operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall perform any needed maintenance and repair for the control system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit K015 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone  
 TLV (ug/m3): 96,000  
 Maximum Hourly Emission Rate (lbs/hr): 146.13  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1  
 MAGLC (ug/m3): 2286

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Emissions Unit ID: K024 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K024 - Spray melt sheet operation and oven	OAC rule 3745-31-05(A)(3) (PTI 05-12466)	<p>Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour (see Section A.I.2.a.)</p> <p>VOC emissions shall not exceed 28.7 tons as a rolling, 12-month summation.</p> <p>Emissions from natural gas combustion in the oven, thermal incinerator and air supply system (see Section A.I.2.b.)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09 (U)(1)(i) and 3745-31-05 (C).</p>
	OAC rule 3745-31-05(C) to avoid PSD requirements	VOC emissions shall not exceed 28.7 tons as a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)	See Section A.I.2.b.

**2. Additional Terms and Conditions**

- a. The emission limitations for pounds of VOC emissions per hour, 24.7, is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with this limit.
- b. The emissions from the combustion of natural gas in the oven, thermal incinerator and air supply system for this emissions unit are limited by PTI 05-7923.

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**II. Operational Restrictions**

1. The permittee shall employ a thermal incinerator at all times during operation of this emissions unit. The thermal incinerator shall have a destruction removal efficiency of at least 90%.

The VOC capture efficiency is conservatively assumed to be 95 percent. The capture efficiency assumption is based upon supplier information and the low vapor pressure of the solvents in the coating, as applied. The percent capture efficiency shall be adjusted if monitoring or testing provides a more accurate estimate for this emissions unit.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time while the emissions unit is operating, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated compliance.

3. The maximum combined material usage for this emissions unit shall not cause VOC emissions to exceed 28.7 tons of VOC per rolling 12 months, calculated using the following formula:

$$AER = \frac{((C1 \times OCc1) + (C2 \times OCc2) + \text{etc...}) \times Ce \times (1 - De) + ((C1 \times OCc1) + (C2 \times OCc2) + \text{etc...}) \times (1 - Ce)}{2000 \text{ lbs/ton}}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

- C = usage of coating, in gallons;  
 OCC = organic compound content of the coatings, in pounds per gallon;  
 Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date);  
 DE = destruction removal efficiency of the thermal incinerator  
 1,2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.
4. The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder 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:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test that demonstrated compliance.
- b. 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 collect and record the following information each month:
- a. the name and identification of each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the VOC content of each coating employed, excluding water and exempt solvents; and
- d. the rolling, 12-month summation of the total VOC emissions, according to the formula in A.II.3.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
- a. The VOC content of the coating material employed in this emissions unit exceed 3.0 pounds per gallon, excluding water and exempt solvents.;
- b. VOC emissions exceed 28.7 tons as a rolling, 12-month summation;
- c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above; and
- d. all downtime of the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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**V. Testing Requirements**

1. Compliance with the emissions limitations specified in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission limitation:

Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

HER = maximum Hour Emission Rate, in pounds per hour;  
 Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;  
 VC = maximum coating VOC content, in pounds per gallon;  
 Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date);  
 and  
 De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- b. Emissions Limitation:
- The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
- Applicable Compliance Method:
- Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings employed.
- c. Emissions Limitation:
- Volatile organic compound (VOC) emissions shall not exceed 28.7 tons as a rolling, 12-month summation
- Applicable Compliance Method:
- Compliance shall be demonstrated through the record keeping requirements in Section A.III.2.d.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
  - The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
  - The following test methods shall be employed to demonstrate compliance:
    - Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
    - Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
    - Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
    - Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
    - Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 an approved alternative test protocol. 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.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).
- Personnel from Ohio EPA, Southwest District Office 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.
- 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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.
4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0546000117 Emissions Unit ID: K024 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: P021 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(P021) - Miscellaneous Solvents on Plastic Parts	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds shall not exceed 970.8 lbs VOC/day.
	OAC 3745-31-05(C)	See A.2.a. below 12.85 tons VOC per rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(2)	See term A.II.1 The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

- Additional Terms and Conditions**

- (P021) - Miscellaneous Solvents on Plastic Parts The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

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- Operational Restrictions**

- The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed 12.85 tons per rolling 12-month period, calculated according to the following formula:

$$[\text{Sum of all } (S) \times (OC)]/2000$$

where:

S = usage of solvent material i, in gallons; and  
OC = the organic compound content of material, in pounds per gallon

- As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in 63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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- Monitoring and/or Record Keeping Requirements**

- The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
  - The company identification for each coating and cleanup material employed.
  - The number of gallons of each coating and cleanup material employed.
  - The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
  - The rolling, 12-monthly summation of the total VOC emissions, according to the formula in A.II.1.
- As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in 63.4530 of that subpart in the manner detailed in 63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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- Reporting Requirements**

- The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.
 

This report is due by the date described in Part I-General Terms and Conditions of this permit under section A.1.
- As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in 63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:
 

12.85 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term A.III.
  - b. Emission Limitation:
 

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP 63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in 63.4540 through 63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: P021 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Plastic parts polish and repair	OAC rule 3745-114-01	Ohio Toxic Policy
<b>2. Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically

coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone  
 TLV (ug/m3): 233,000  
 Maximum Hourly Emission Rate (lbs/hr): 40.45  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.133  
 MAGLC (ug/m3): 5547.62

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

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

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: P025 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - injection molding machine, # 1	OAC rule 3745-31-05(A)(3) (PTI 05-14163)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.  The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
	OAC rule 3745-31-05(C)	The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G) VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.
	OAC rule 3745-21-07(G)(2)	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined. See Section A.I.2.a.

**2. Additional Terms and Conditions**

- a. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

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**II. Operational Restrictions**

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$AER = [(M1 \times OCm1) + (M2 \times OCm2) + \text{etc...}] / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
M = usage of mold agent or cleaning solvent, in gallons  
OCm = Volatile organic compound content of material, in pounds VOC per gallon; and  
1,2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$AER = (P \times EF) / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

P = usage of plastic pellets employed, in pounds; and  
 EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification for each liquid organic material employed; and
  - b. whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:
  - a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
  - b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
  - c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
  - d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in Part III - Section A.II.1. of this permit;
  - e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
  - f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
  - g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07 (G)(9);
  - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
  - c. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

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### V. Testing Requirements

1. Compliance with the emission limitations in Section A..I. of these terms and conditions shall be determined in accordance with the following methods:

#### a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$HER = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)$$

where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MPv = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WSv = the VOC content of the wiping solvent, lbs VOC/gal

\* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Section A.III.2.d. of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Section A.III.2.g. of this permit.

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

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0546000117 Emissions Unit ID: P025 Issuance type: Title V Preliminary Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - injection molding machine, # 1	OAC 3745-31-05(A)(3)	Ohio Toxics Policy see Sections B.III.1, B.III.2, and B.III.3

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
 

Pollutant: Isopropanol  
 TLV (ug/m3): 491,500  
 Maximum Hourly Emission Rate (lbs/hr): 13.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 944.5  
 MAGLC (ug/m3): 11,702
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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: P026 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Injection Molding Machine # 2 (formerly emissions unit P335)	OAC rule 3745-31-05(A)(3) (PTI 05-14163)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.  The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
	OAC rule 3745-31-05(C)	The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G) VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.
	OAC rule 3745-21-07(G)(2)	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined. See Section A.I.2.a.

**2. Additional Terms and Conditions**

- a. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

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**II. Operational Restrictions**

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$AER = [(M1 \times OCm1) + (M2 \times OCm2) + \text{etc...}] / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
M = usage of mold agent or cleaning solvent, in gallons  
OCm = Volatile organic compound content of material, in pounds VOC per gallon; and  
1,2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$AER = (P \times EF) / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
 P = usage of plastic pellets employed, in pounds; and  
 EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification for each liquid organic material employed; and
  - b. whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:
  - a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
  - b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
  - c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
  - d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in Part III - Section A.II.1. of this permit;
  - e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
  - f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
  - g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07 (G)(9);
  - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
  - c. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

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### V. Testing Requirements

1. Compliance with the emission limitations in Section A..I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$HER = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)$$

where:

HER = Hourly Emission Rate, in lbs/hr;  
 PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);  
 PPv = the VOC content of the plastic pellets, lb VOC/lb material;  
 MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);  
 MRv = the VOC content of the mold release, lbs VOC/gal;  
 MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);  
 MPv = the VOC content of the mold protectant, lbs VOC/gal;  
 MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;  
 WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and  
 Wsv = the VOC content of the wiping solvent, lbs VOC/gal

\* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Section A.III.2.d. of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Section A.III.2.g. of this permit.

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0546000117 Emissions Unit ID: P026 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Injection Molding Machine # 2 (formerly emissions unit P335)	OAC rule 3745-31-05(A)(3) (PTI 05-14163)	Ohio Toxics Policy  see Sections B.III.1, B.III.2, and B.III.3

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol  
TLV (ug/m3): 491,500  
Maximum Hourly Emission Rate (lbs/hr): 13.24  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 944.5  
MAGLC (ug/m3): 11,702

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

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

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.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: P027 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Injection Molding machine # 3	OAC rule 3745-31-05(A)(3) (PTI 05-14163)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.  The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
	OAC rule 3745-31-05(C)	The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G) VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.
	OAC rule 3745-21-07(G)(2)	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined. See Section A.I.2.a.

**2. Additional Terms and Conditions**

- a. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

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**II. Operational Restrictions**

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$AER = [(M1 \times OCm1) + (M2 \times OCm2) + \text{etc...}] / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
M = usage of mold agent or cleaning solvent, in gallons  
OCm = Volatile organic compound content of material, in pounds VOC per gallon; and  
1, 2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$\text{AER} = (\text{P} \times \text{EF}) / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;  
 P = usage of plastic pellets employed, in pounds; and  
 EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification for each liquid organic material employed; and
  - b. whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:
  - a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
  - b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
  - c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
  - d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in Part III - Section A.II.1. of this permit;
  - e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
  - f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
  - g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07 (G)(9);
  - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
  - c. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

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### V. Testing Requirements

1. Compliance with the emission limitations in Section A..I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$\text{HER} = (\text{PP})(\text{PPv})(0.03^*) + (\text{MR})(\text{MRv}) + (\text{MP})(\text{MPv}) + (\text{MC})(\text{MCv}) + (\text{WS})(\text{WSv})$$

where:

HER = Hourly Emission Rate, in lbs/hr;  
 PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);  
 PPv = the VOC content of the plastic pellets, lb VOC/lb material;  
 MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);  
 MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);  
 MPv = the VOC content of the mold protectant, lbs VOC/gal;  
 MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);  
 MCv = the VOC content of the mold cleaner, lbs VOC/gal;  
 WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and  
 WSv = the VOC content of the wiping solvent, lbs VOC/gal

\* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Section A.III.2.d. of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Section A.III.2.g. of this permit.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0546000117 Emissions Unit ID: P027 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Injection Molding machine # 3	OAC rule 3745-31-05(A)(3) (PTI 05-14163)	Ohio Toxics Policy see Sections B.III.1, B.III.2, and B.III.3

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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### III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol  
 TLV (ug/m3): 491,500  
 Maximum Hourly Emission Rate (lbs/hr): 13.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 944.5  
 MAGLC (ug/m3): 11,702

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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.

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### IV. Reporting Requirements

1. None

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### V. Testing Requirements

1. None

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### VI. Miscellaneous Requirements

1. None