

Facility ID: 0546010102 Issuance type: Final State Permit To Operate

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 II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0546010102 Emissions Unit ID: K007 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>   |
|---|---|--|
| K007 - Adhesive dispensing station no. 1      | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 0.55 pounds per hour, excluding cleanup materials.<br><br>VOC content shall not exceed 0.274 pounds per gallon of adhesive and 7.3 pounds per gallon of cleanup materials.<br><br>Emissions from natural gas combustion in the drying oven (1 mmBtu/hr) :<br><br>0.002 lb PE(filterable)/hr<br>0.0006 lb SO <sub>2</sub> /hr<br>0.10 lbs NO <sub>x</sub> /hr<br>0.08 lbs CO/hr<br>0.005 lb VOC/hr |
|   | OAC rule 3745-31-05(C)                    | See A.I.2.a, below.<br>VOC emissions shall not exceed 1.76 tons per rolling, 12-month summation with cleanup materials.  |
|   | OAC rule 3745-21-07(G)(2)                 | See A.2.b, below.<br>See A.I.2.c, below.   |
|   | 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 3745-17-10(B)                    | The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).  |

2. **Additional Terms and Conditions**

- (a) The VOC emission limit of 0.55 lbs per hour, and the hourly emission limits from natural gas combustion are established 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.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
The liquid organic materials or substances containing liquid organic material used in this emissions unit are not baked, heat-cured, or heat-polymerized, and do not come into contact with flame. As such, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(1). Furthermore, the adhesives employed in this emissions unit shall not contain photochemically reactive material (per the definition in OAC rule 3745-21-01(C)(5)). Therefore, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(2).

B. **Operational Restrictions**

1. The maximum annual adhesive usage for this emissions unit shall not exceed 6,475 gallons, based upon a rolling, 12-month summation of the adhesive usage figures.  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 240 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:
- The name and identification number of each adhesive and cleanup material employed;
  - Documentation whether or not each adhesive and cleanup material employed is "Photochemically Reactive Material" as defined in OAC rule 3745-21-01(C)(5);
  - The VOC content of each adhesive and cleanup material employed, in pounds per gallon;
  - The volume, in gallons, of each adhesive and cleanup material employed;
  - The rolling, 12-month summation of the volume, in gallons, of all adhesives employed;
  - The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;
  - The total VOC emissions from all the adhesives and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each coating and cleanup material employed during the month];
  - The combined rolling 12-month summation of VOC emissions from the adhesives and cleanup materials employed in this emissions unit, in tons.
2. The permittee shall collect and record the following information each month for the entire facility:
- the name and identification number of each HAP-containing material (including adhesives, coatings and cleanup materials) employed;
  - the individual Hazardous Air Pollutant (HAP)\* content for each HAP of each HAP-containing material\* in pounds of individual HAP per gallon of coating, as applied;
  - the total combined HAP content of each coating material in pounds of combined HAPs per gallon of material coating, as applied [sum all the individual HAP contents from (b)];
  - the number of gallons of each HAP-containing material\* employed;
  - the total individual HAP usage for each HAP from all HAP-containing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
  - the total combined HAP usage from all HAP-containing material, in pounds or tons per month [the sum of (c) times (d) for each material];
  - the updated rolling, 12-month summation of usage for each individual HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - the updated rolling, 12-month summation of usage for total combined HAP\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- \*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.
- \*\*This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.
3. The permit to install for this emissions unit 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" pollutants:

Pollutant: Methylene bisphenyl isocyanate (MDI)  
 TLV (mg/m3): 0.05  
 Maximum Hourly Emission Rate: 0.0035 lb/hr and 0.000442 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.0009  
 MAGLC (mg/m3): 0.005

Pollutant: Toluene  
 TLV (mg/m3): 188.0  
 Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662  
 MAGLC (mg/m3): 18.8

4. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

5. 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.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

- a. the rolling, 12-month adhesive usage limitation of 6,475 gallons;
- b. the rolling, 12-month cleanup material usage limitation of 240 gallons;
- c. the rolling, 12-month VOC emission limitation of 1.76 tons;
- d. the rolling, 12-month individual HAP emission limitation of 9.9 tons; and
- e. the rolling, 12-month combined HAP emissions limitation of 24.9 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying adhesives and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.
3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

#### E. Testing Requirements

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

0.55 lbs VOC/hr

## Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$Er = (Au) * (VOCa) + (Cu) * (VOCc)$$

where,

Er = the hourly VOC emission rate, lbs/hr  
 Au = maximum hourly adhesive usage rate of 2 gallons  
 VOCa = the maximum VOC content of the adhesive, 0.274 lbs/gallon  
 Cu = the maximum hourly catalyst usage rate of 0.03 gallons  
 VOCc = the maximum VOC content for the catalyst, 0 lbs/gallon

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation needs shall be based upon a mass balance equation.

Emission Limitations:

0.274 lbs VOC/gal of adhesive and 7.3 lbs VOC/gal of cleanup materials

## Applicable Compliance Method:

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

Emission Limitations:

0.002 lb PE(filterable)/hr  
 0.0006 lb SO<sub>2</sub>/hr  
 0.10 lbs NO<sub>x</sub>/hr  
 0.08 lbs CO/hr  
 0.005 lb VOC/hr

## Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (980.4 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 - 5; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

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

Emission Limitation:

1.76 tons VOC per rolling, 12-month summation

## Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.  
 Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 of this permit.

F. **Miscellaneous Requirements**

1. The following sections within this permit are federally enforceable A., B., C.1., D., and E.

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Facility ID: 0546010102 Emissions Unit ID: K011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>  |
|---|---|---|
| K011 - Adhesive dispensing                    | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.9 pounds per hour.<br>VOC content shall not exceed 0.274 pounds per gallon of adhesive and 7.3 pounds per gallon of cleanup materials. |
|   | OAC rule 3745-31-05(C)                    | See A.2.a, below<br>VOC emissions shall not exceed 4.16 tons per rolling, 12-month summation with cleanup materials.  |
|   | OAC rule 3745-21-09(U)                    | See A.2.b, below.<br>The VOC content limitation specified per this rule is less stringent than the limit established per OAC rule 3745-31-05(A)(3).   |

**2. Additional Terms and Conditions**

- (a) The VOC emission limit of 1.9 lbs per hour is established 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.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
  
\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
  
The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual adhesive usage for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the adhesive usage figures.  
  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 240 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.  
  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:
  - a. The name and identification number of each adhesive and cleanup material employed;
  - b. The VOC content of each adhesive and cleanup material employed, in pounds per gallon;
  - c. The volume, in gallons, of each adhesive and cleanup material employed;
  - e. The rolling, 12-month summation of the volume, in gallons, of all adhesive employed;
  - f. The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;
  - g. The total VOC emissions from all the adhesives and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each adhesive and cleanup material employed during the month];
  - h. The combined rolling 12-month summation of VOC emissions from the adhesives and cleanup materials employed in this emissions unit, in tons.
2. The permit to install for this emissions unit 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" pollutants:

Pollutant: Methylene bisphenyl isocyanate (MDI)  
 TLV (mg/m3): 0.05  
 Maximum Hourly Emission Rate: 0.005 lb/hr or 0.00065 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.001  
 MAGLC (mg/m3): 0.005

Pollutant: Toluene  
 TLV (mg/m3): 188.0  
 Maximum Hourly Emission Rate (lbs/hr): 0.34 lb/hr and 0.043 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.101  
 MAGLC (mg/m3): 18.8

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

a. the rolling, 12-month adhesive usage limitation of 24,000 gallons;

b. the rolling, 12-month cleanup material usage limitation of 240 gallons; and

c. the rolling, 12-month VOC emission limitation of 4.16 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying adhesive and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

#### E. Testing Requirements

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

Emission Limitation:

1.9 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E_r = (A) * (VOC_a) + (C) * (VOC_c)$$

where,

$E_r$  = the hourly VOC emission rate, lbs/hr

$A$  = maximum hourly adhesive usage rate of 7 gallons

$VOC_a$  = the maximum VOC content of the adhesive, 0.274 lbs/gallon

$C$  = the maximum hourly catalyst usage rate of 0.03 gallons

$VOC_c$  = the maximum VOC content for the catalyst, 0 lbs/gallon

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation needs shall be based upon a mass balance equation.

Emission Limitations:

0.274 lbs VOC/gal of adhesive and 7.3 lbs VOC/gal of cleanup materials

Applicable Compliance Method:

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

Emission Limitation:

4.16 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

**F. Miscellaneous Requirements**

1. The following sections within this permit are federally enforceable A., B., C.1., D., and E.

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**Facility ID: 0546010102 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>   |
|---|---|--|
| R001 - Automatic holder station               | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 3.68 pounds per hour, excluding cleanup materials.<br>VOC content shall not exceed 4.90 pounds per gallon of coating and 6.71 pounds per gallon of cleanup materials. |
|   | OAC rule 3745-31-05(C)                    | See A.I.2.a, below.<br>VOC emissions shall not exceed 1.76 tons per rolling, 12-month summation with cleanup materials.  |
|   | OAC rule 3745-21-07(G)                    | See A.2.b, below.<br>See A.I.2.c, below.   |

**2. Additional Terms and Conditions**

- (a) The VOC emission limit of 3.68 lbs per hour is established 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.  
 The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used

evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

The liquid organic materials or substances containing liquid organic material used in this emissions unit are not baked, heat-cured, or heat-polymerized, and do not come into contact with flame. As such, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(1). Furthermore, the materials employed in this emissions unit shall not contain photochemically reactive material (per the definition in OAC rule 3745-21-01(C)(5)). Therefore, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 1,248 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 390 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:

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

b. Documentation whether or not each coating and cleanup material employed is "Photochemically Reactive Material" as defined in OAC rule 3745-21-01(C)(5);

c. The VOC content of each coating and cleanup material employed, in pounds per gallon;

d. The volume, in gallons, of each coating and cleanup material employed;

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

f. The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;

g. The total VOC emissions from all the coatings and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each coating and cleanup material employed during the month];

h. The combined rolling 12-month summation of VOC emissions from the coatings and cleanup materials employed in this emissions unit, in tons.

2. The permit to install for this emissions unit 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" pollutants:

Pollutant: Methylene bisphenyl isocyanate (MDI)

TLV (mg/m3): 0.05

Maximum Hourly Emission Rate: 0.0045 lb/hr or 0.00057 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.0012

MAGLC (mg/m3): 0.005

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662

MAGLC (mg/m3): 59.0

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification.

4. 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.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
  - a.the rolling, 12-month coating usage limitation of 1,248 gallons;
  - b.the rolling, 12-month cleanup material usage limitation of 390 gallons;
  - c.the rolling, 12-month VOC emission limitation of 4.37 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.
2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.
3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

**E. Testing Requirements**

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

Emission Limitation:

3.68 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by multiplying the maximum hourly coating usage of 0.75 gallons by the maximum VOC content of the coating, 4.9 lbs/gal. Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

Emission Limitations:

4.9 lbs VOC/gal of coating and 6.71 lbs VOC/gal of cleanup materials

Applicable Compliance Method:

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

Emission Limitation:

4.37 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

**F. Miscellaneous Requirements**

1. The following sections within this permit are federally enforceable A., B., C.1., D., and E.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 0546010102 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with

ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>  |
|---|---|---|
| R002 - Prime glass station                    | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.<br>VOC content shall not exceed 6.94 pounds per gallon of coating.<br><br>See A.1.2.a, below. |
|   | OAC rule 3745-31-05(C)                    | VOC emissions shall not exceed 2.13 tons per rolling, 12-month summation with cleanup materials.  |
|   | OAC rule 3745-21-07(G)(2)                 | See A.2.b, below.<br>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).  |

**2. Additional Terms and Conditions**

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.  
 The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
  
 \*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
  
 The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 615 gallons, based upon a rolling, 12-month summation of the coating usage figures.  
  
 The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:
  - a.The name and identification number of each coating employed;
  - b.The VOC content of each coating employed, in pounds per gallon;
  - c.The volume, in gallons, of each coating employed;
  - d.The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
  - e.The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
  - f.The combined rolling 12-month summation of VOC emissions from the coatings employed in this emissions unit, in tons.
2. The permit to install for this emissions unit 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

Pollutant: Toluene  
 TLV (mg/m3): 188.0  
 Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662  
 MAGLC (mg/m3): 18.8

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

a. the rolling, 12-month coating usage limitation of 615 gallons;

b. the rolling, 12-month VOC emission limitation of 2.13 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

#### E. Testing Requirements

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

Emission Limitation:  
 1.0 lbs VOC/hr and 24.0 lbs VOC/day  
 Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate  
 P1 = the maximum hourly usage of primer no. 1, 0.04 gal  
 VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal  
 P2 = the maximum hourly usage of primer no. 2, 0.15 gal  
 VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

2.13 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. **Miscellaneous Requirements**

1. The Following sections within this permot are federally enforceable A.,B.,C.1.,D.,and E

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Facility ID: 0546010102 Emissions Unit ID: R005 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

A. **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>  |
|---|--|---|
| R005 - Holder primer                          | OAC rule 3745-31-05(A)<br>PTI 05-13889 | Volatile organic compound emissions shall not exceed 1.2 pounds per hour.<br><br>The VOC content limit established by this rule is equivalent to the limit specified by OAC rule 3745-21-09(U)(1)(g). |
|   | OAC rule 3745-31-05(C)                 | See A.2.a, below<br>VOC emissions shall not exceed 1.72 tons per rolling, 12-month summation with cleanup materials.  |
|   | OAC rule 3745-21-09(U)(1)(g)           | See A.2.b, below.<br>VOC content shall not exceed 4.9 pounds per gallon, excluding water and exempt solvents, for glass adhesion body primer coating.   |

2. **Additional Terms and Conditions**

- (a) The VOC emission limit of 1.2 lbs per hour is established 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.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 702 gallons, minus water and exempt solvents, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:
  - a. The name and identification number of each coating employed;
  - b. The VOC content of each coating employed, in pounds per gallon, minus water and exempt solvents;
  - c. The volume, in gallons, of each coating material employed, minus water and exempt solvents;
  - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed, minus water and exempt solvents;
  - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
  - f. The combined rolling 12-month summation of VOC emissions from coatings employed in this emissions unit, in tons.
2. The permit to install for this emissions unit 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" pollutants:

Pollutant: Methylene bisphenyl isocyanate (MDI)  
 TLV (mg/m3): 0.05  
 Maximum Hourly Emission Rate: 0.019 lb/hr or 0.0025 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.0007  
 MAGLC (mg/m3): 0.005

Pollutant: Methyl ethyl ketone  
 TLV (mg/m3): 590  
 Maximum Hourly Emission Rate: 0.34 lb/hr or 0.0433 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.101  
 MAGLC (mg/m3): 59.0

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi
4. 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

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
  - a.the rolling, 12-month coating limitation of 702 gallons, minus water and exempt solvents;
  - b.the rolling, 12-month VOC emission limitation of 1.72 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.
2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coating, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

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

Emission Limitation:

1.2 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by multiplying the maximum hourly coating usage of 0.25 gallons by the maximum VOC content of 4.9 pounds per gallon, minus water and exempt solvents. Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

Emission Limitations:

4.9 lbs VOC/gal of coating, minus water and exempt solvents

Applicable Compliance Method:

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

Emission Limitation:

1.72 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.  
Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0546010102 Emissions Unit ID: R009 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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</u> |
|---|--------------------------------------|---|
|---|--------------------------------------|---|

|                                |   |   |
|--------------------------------|---|---|
| R009 - Prime glass station no. | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | <p><b>Measures</b></p> <p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p> <p>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.</p> <p>See A.2.b, below.</p> <p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p> |
|                                | OAC rule 3745-31-05(C)                    |   |
|                                | OAC rule 3745-21-07(G)(2)                 |   |

**2. Additional Terms and Conditions**

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
  
\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
  
The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

- 1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.  
  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

- 1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
  - a.The name and identification number of each coating employed;
  - b.The VOC content of each coating employed, in pounds per gallon;
  - c.The volume, in gallons, of each coating employed;
  - d.The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
  - e.The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
  - f.The combined rolling 12-month summation of VOC emissions from the coatings employed.
- 2. The permit to install for this emissions unit 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" pollutants:  
  
Pollutant: Toluene  
TLV (mg/m3): 188.0  
Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662  
MAGLC (mg/m3): 18.8
- 3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

a.the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;

b.the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

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

Emission Limitation:  
1.0 lbs VOC/hr and 24.0 lbs VOC/day  
Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate  
P1 = the maximum hourly usage of primer no. 1, 0.06 gal  
VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal  
P2 = the maximum hourly usage of primer no. 2, 0.11 gal  
VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0546010102 Emissions Unit ID: R010 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>  |
|---|---|---|
| R010 - Prime glass station no. 2              | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.<br><br>VOC content shall not exceed 6.94 pounds per gallon of coating.<br><br>See A.I.2.a, below. |
|   | OAC rule 3745-31-05(C)                    | VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.  |
|   | OAC rule 3745-21-07(G)(2)                 | See A.2.b, below.<br>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).  |

**2. Additional Terms and Conditions**

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.  
 The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
  
 \*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
  
 The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.  
  
 The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
  - a. The name and identification number of each coating employed;

- b. The VOC content of each coating employed, in pounds per gallon;
- c. The volume, in gallons, of each coating employed;
- d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
- e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
- f. The combined rolling 12-month summation of VOC emissions from the coatings employed.
2. The permit to install for this emissions unit 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" pollutants:
- Pollutant: Toluene  
 TLV (mg/m3): 188.0  
 Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662  
 MAGLC (mg/m3): 18.8
3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition.
4. 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
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
- a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;
- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;
- These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.
2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.
- E. Testing Requirements**
1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation:  
 1.0 lbs VOC/hr and 24.0 lbs VOC/day
- Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

- E = the hourly VOC emission rate
- P1 = the maximum hourly usage of primer no. 1, 0.06 gal
- VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal
- P2 = the maximum hourly usage of primer no. 2, 0.11 gal
- VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E

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Facility ID: 0546010102 Emissions Unit ID: R011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>   |
|---|---|--|
| R011 - Prime glass station no. 3              | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.<br><br>VOC content shall not exceed 6.94 pounds per gallon of coating. |
|   | OAC rule 3745-31-05(C)                    | See A.I.2.a, below.<br>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.                      |

OAC rule 3745-21-07(G)(2)

See A.2.b, below.

The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).

## 2. Additional Terms and Conditions

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.

The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

## B. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit

## C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:

- a. The name and identification number of each coating employed;
- b. The VOC content of each coating employed, in pounds per gallon;
- c. The volume, in gallons, of each coating employed;
- d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
- e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
- f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

2. The permit to install for this emissions unit 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" pollutants:

Pollutant: Toluene  
 TLV (mg/m<sup>3</sup>): 188.0  
 Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.1662  
 MAGLC (mg/m<sup>3</sup>): 18.8

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
- a.the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;
  - b.the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;
- These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.
2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

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

Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.11 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0546010102 Emissions Unit ID: R012 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>  |
|---|---|---|
| R012 - Prime glass station no. 4              | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.<br><br>VOC content shall not exceed 6.94 pounds per gallon of coating.<br><br>See A.I.2.a, below. |
|   | OAC rule 3745-31-05(C)                    | VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.  |
|   | OAC rule 3745-21-07(G)(2)                 | See A.2.b, below<br>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).   |

**2. Additional Terms and Conditions**

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  
  
\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.  
  
The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.  
  
The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
  - a. The name and identification number of each coating employed;
  - b. The VOC content of each coating employed, in pounds per gallon;
  - c. The volume, in gallons, of each coating employed;
  - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
  - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];

f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

2. The permit to install for this emissions unit 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

Pollutant: Toluene  
 TLV (mg/m3): 188.0  
 Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.1662  
 MAGLC (mg/m3): 18.8

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
- a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;
- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;
- These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.
2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

#### E. Testing Requirements

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

Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal  
 P2 = the maximum hourly usage of primer no. 2, 0.11 gal  
 VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.  
 Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.  
 Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 0546010102 Emissions Unit ID: R014 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. 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>   |
|---|---|--|
| R014 - Side window priming station            | OAC rule 3745-31-05(A)(3)<br>PTI 05-13889 | Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.  |
|   |   | VOC content shall not exceed 6.94 pounds per gallon of coating.  |
|   | OAC rule 3745-31-05(C)                    | See A.I.2.a, below.<br>VOC emissions shall not exceed 2.13 tons per rolling, 12-month summation with cleanup materials.                                |
|   | OAC rule 3745-21-07(G)(2)                 | See A.2.b, below.<br>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3). |

**2. Additional Terms and Conditions**

- (a) The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established 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.

The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

**B. Operational Restrictions**

1. The maximum annual coating usage for this emissions unit shall not exceed 615 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

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

1. The permittee shall maintain monthly records for this emissions unit of the following information:
  - a. The name and identification number of each coating employed;
  - b. The VOC content of each coating employed, in pounds per gallon;
  - c. The volume, in gallons, of each coating employed;
  - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
  - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
  - f. The combined rolling 12-month summation of VOC emissions from the coatings employed in this emissions unit, in tons.

2. The permit to install for this emissions unit 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" pollutants:

Pollutant: Methyl ethyl ketone  
 TLV (mg/m<sup>3</sup>): 590.0  
 Maximum Hourly Emission Rate: 1.022 lb/hr or 0.129 g/s  
 Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.141  
 MAGLC (mg/m<sup>3</sup>): 59.0

3. 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defi

4. 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

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

- a.the rolling, 12-month coating usage limitation of 615 gallons;
- b.the rolling, 12-month VOC emission limitation of 2.13 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

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

Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.04 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.15 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

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

Emission Limitation:

2.13 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit

**F. Miscellaneous Requirements**

1. The Following sections within this permit are federally enforceable A.,B.,C.1.,D.,and E