

Facility ID: 0605010093 Issuance type: Title V Preliminary Proposed Permit

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

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

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

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions unit is located at this facility:

P001 - general cleanup area

This insignificant emissions unit must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a permit to install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0605010093 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #1 for coating plastic parts	OAC rule 3745-31-05 (PTI 06-5609)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which no photochemically reactive materials (coatings and/or cleanup materials) are employed. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07	See A.I.2.a through A.I.2.d below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Emissions of particulate matter shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which any photochemically reactive materials (coatings and/or cleanup materials), as defined in OAC rule 3745-21-01(C)(5), are employed in this emissions unit.

2. Additional Terms and Conditions

- a. The permittee shall employ high volume, low pressure (HVLP) spray guns except when prohibited by customer demands or specifications.
- b. Emissions of particulate matter shall not exceed 2.41 tpy.
- c. The total emissions of organic compounds for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) are employed shall not exceed 61.32 tpy.
- d. The total emissions of organic compounds from emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
- e. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any operation of this emissions unit.

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II. Operational Restrictions

1. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
2. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 8.33 tons per month.
3. The total quantity of organic compounds applied in emissions units R001, R002, R003, and R004, combined, is equivalent to the total organic compound emissions.
4. The permittee shall demonstrate compliance with the rolling, 12-month organic compound limitation and shall comply with the monthly monitoring and record keeping requirements immediately upon issuance of this permit by using data from the previous 12 months of operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day any photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the number of gallons of each nonphotochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon;
 - f. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - g. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day;
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (f)/(h), in pounds per hour (average); and
 - j. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information for each day no photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average); and
 - g. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
3. The permittee shall maintain monthly records of the following information:
 - a. the total organic compound emissions from this emissions unit, in pounds (the summation of A.III.1.f, A.III.1.g, and A.III.2.d);
 - b. the total organic compound emissions from this emissions unit for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) were employed, in pounds (the summation of A.III.2.d);
 - c. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, in pounds;
 - d. the total organic compound emissions from this emissions unit, as a rolling, 12-month summation, in

pounds; and

- e. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, as a rolling, 12-month summation, in pounds.
4. The permittee shall record each day the time periods that the high volume, low pressure (HVLP) spray guns are not employed in this emissions unit, along with an explanation for not using them.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this spray booth:
 - a. for the days during which any photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which any photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. for the days during which no photochemically reactive coatings or cleanup materials were employed, an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 14.0 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - d. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 8.33 tons per month, and the actual organic compound emissions, in tons, for each such month;
 - e. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 100 tons per rolling, 12-month period, and the actual organic compounds emissions, in tons, for each such rolling, 12-month period;
 - f. an identification of each day during which the emissions unit was in operation and the spray booth filter was not in service; and
 - g. an identification of each day during which the high volume, low pressure (HVLP) spray guns were not employed, along with an explanation for not using them.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit during the previous calendar year.

The permittee shall submit annual reports that specify the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, for the previous calendar year.

The permittee shall submit annual reports that specify the total OC emissions for all days during which no photochemically reactive materials were employed.

These annual reports shall be submitted by January 31 of each year.

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V. Testing Requirements

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

8 pounds per hour of organic compounds
40 pounds per day of organic compounds

Application Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
 - b. Emission Limitation:

14.0 pounds per hour of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

- c. Emission Limitation:
61.32 tpy of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed
Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.
- d. Emission Limitation:
100 tpy of total organic compound emissions for emissions units R001, R002, R003, and R004, combined
Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1, A.III.2, and A.III.3.
- e. Emission Limitation:
0.551 lb/hr of particulate emissions
Applicable Compliance Method:
To determine the actual worst case particulate emission rate, the following equation shall be used:
$$E = (M) * (1-TE) * (1-CE)$$
where:
E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),
CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.
If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).
- f. Emission Limitation:
2.41 tpy of particulate emissions
Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the allowable particulate emission limitation (0.551 pound per hour) by the actual hours of operation for the year, and then dividing by 2000 pounds per ton.
- g. Emission Limitation:
20% opacity as a 6-minute average
Applicable Compliance Method:
Compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
- h. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0605010093 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.3744

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.12

MAGLC (ug/m3): 10,333

Pollutant: ethyl acetate

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 4.7008

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 971.6

MAGLC (ug/m3): 34,285.7

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 7.0928

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1459.6

MAGLC (ug/m3): 14,047.6

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.8096

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 377.24

MAGLC (ug/m3): 4,476.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0605010093 Emissions Unit ID: R002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #2 for coating plastic parts	OAC rule 3745-31-05 (PTI 06-5609)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which no photochemically reactive materials (coatings and/or cleanup materials) are employed. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07	See A.I.2.a through A.I.2.d below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Emissions of particulate matter shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which any photochemically reactive materials (coatings and/or cleanup materials), as defined in OAC rule 3745-21-01(C)(5), are employed in this emissions unit.

2. Additional Terms and Conditions

- a. The permittee shall employ high volume, low pressure (HVLP) spray guns except when prohibited by customer demands or specifications.
- b. Emissions of particulate matter shall not exceed 2.41 tpy.
- c. The total emissions of organic compounds for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) are employed shall not exceed 61.32 tpy.
- d. The total emissions of organic compounds from emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
- e. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any operation of this emissions unit.

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II. Operational Restrictions

- 1. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
- 2. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 8.33 tons per month.
- 3. The total quantity of organic compounds applied in emissions units R001, R002, R003, and R004, combined, is equivalent to the total organic compound emissions.
- 4. The permittee shall demonstrate compliance with the rolling, 12-month organic compound limitation and shall comply with the monthly monitoring and record keeping requirements immediately upon issuance of this permit by using data from the previous 12 months of operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day any photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;

- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the number of gallons of each nonphotochemically reactive cleanup material employed;
- d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- e. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon;
- f. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- g. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day;
- h. the total number of hours the emissions unit was in operation;
- i. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (f)/(h), in pounds per hour (average); and
- j. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for each day no photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average); and
 - g. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
3. The permittee shall maintain monthly records of the following information:
 - a. the total organic compound emissions from this emissions unit, in pounds (the summation of A.III.1.f, A.III.1.g, and A.III.2.d);
 - b. the total organic compound emissions from this emissions unit for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) were employed, in pounds (the summation of A.III.2.d);
 - c. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, in pounds;
 - d. the total organic compound emissions from this emissions unit, as a rolling, 12-month summation, in pounds; and
 - e. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, as a rolling, 12-month summation, in pounds.
4. The permittee shall record each day the time periods that the high volume, low pressure (HVLP) spray guns are not employed in this emissions unit, along with an explanation for not using them.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this spray booth:
 - a. for the days during which any photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which any photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup

materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. for the days during which no photochemically reactive coatings or cleanup materials were employed, an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 14.0 pounds per hour, and the actual average hourly organic compound emissions for each such day;

d. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 8.33 tons per month, and the actual organic compound emissions, in tons, for each such month;

e. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 100 tons per rolling, 12-month period, and the actual organic compounds emissions, in tons, for each such rolling, 12-month period;

f. an identification of each day during which the emissions unit was in operation and the spray booth filter was not in service; and

g. an identification of each day during which the high volume, low pressure (HVLP) spray guns were not employed, along with an explanation for not using them.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit during the previous calendar year.

The permittee shall submit annual reports that specify the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, for the previous calendar year.

The permittee shall submit annual reports that specify the total OC emissions for all days during which no photochemically reactive materials were employed.

These annual reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 8 pounds per hour of organic compounds
 - 40 pounds per day of organic compounds
 Application Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.
 - b. Emission Limitation:
 - 14.0 pounds per hour of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed
 Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.
 - c. Emission Limitation:
 - 61.32 tpy of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed
 Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.
 - d. Emission Limitation:
 - 100 tpy of total organic compound emissions for emissions units R001, R002, R003, and R004, combined
 Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1, A.III.2, and A.III.3.

e. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),
 M = maximum coating solids usage rate (lbs/hr),
 TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),
 CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable particulate emission limitation (0.551 pound per hour) by the actual hours of operation for the year, and then dividing by 2000 pounds per ton.

g. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

h. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0605010093 Emissions Unit ID: R002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

- | <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| 2. | spray booth #1 for coating plastic parts | |
| Additional Terms and Conditions | | |
| 1. | None | |

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.3744

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.12

MAGLC (ug/m3): 10,333

Pollutant: ethyl acetate

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 4.7008

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 971.6

MAGLC (ug/m3): 34,285.7

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 7.0928

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1459.6

MAGLC (ug/m3): 14,047.6

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.8096

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 377.24

MAGLC (ug/m3): 4,476.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0605010093 Emissions Unit ID: R003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #3 for coating plastic parts	OAC rule 3745-31-05 (PTI 06-5609)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which no photochemically reactive materials (coatings and/or cleanup materials) are employed.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.

See A.I.2.a through A.I.2.d below.

OAC rule 3745-17-07	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11	Emissions of particulate matter shall not exceed 0.551 pound per hour.
OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which any photochemically reactive materials (coatings and/or cleanup materials), as defined in OAC rule 3745-21-01(C)(5), are employed in this emissions unit.

2. Additional Terms and Conditions

- a. The permittee shall employ high volume, low pressure (HVLP) spray guns except when prohibited by customer demands or specifications.
- b. Emissions of particulate matter shall not exceed 2.41 tpy.
- c. The total emissions of organic compounds for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) are employed shall not exceed 61.32 tpy.
- d. The total emissions of organic compounds from emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
- e. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any operation of this emissions unit.

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II. Operational Restrictions

1. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
2. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 8.33 tons per month.
3. The total quantity of organic compounds applied in emissions units R001, R002, R003, and R004, combined, is equivalent to the total organic compound emissions.
4. The permittee shall demonstrate compliance with the rolling, 12-month organic compound limitation and shall comply with the monthly monitoring and record keeping requirements immediately upon issuance of this permit by using data from the previous 12 months of operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day any photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the number of gallons of each nonphotochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon;
 - f. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - g. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day;
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (f)/(h), in pounds per hour (average); and
 - j. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added

- at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01 (C)(5).]
2. The permittee shall collect and record the following information for each day no photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average); and
 - g. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
 3. The permittee shall maintain monthly records of the following information:
 - a. the total organic compound emissions from this emissions unit, in pounds (the summation of A.III.1.f, A.III.1.g, and A.III.2.d);
 - b. the total organic compound emissions from this emissions unit for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) were employed, in pounds (the summation of A.III.2.d);
 - c. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, in pounds;
 - d. the total organic compound emissions from this emissions unit, as a rolling, 12-month summation, in pounds; and
 - e. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, as a rolling, 12-month summation, in pounds.
 4. The permittee shall record each day the time periods that the high volume, low pressure (HVLP) spray guns are not employed in this emissions unit, along with an explanation for not using them.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this spray booth:
 - a. for the days during which any photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which any photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. for the days during which no photochemically reactive coatings or cleanup materials were employed, an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 14.0 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - d. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 8.33 tons per month, and the actual organic compound emissions, in tons, for each such month;
 - e. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 100 tons per rolling, 12-month period, and the actual organic compounds emissions, in tons, for each such rolling, 12-month period;
 - f. an identification of each day during which the emissions unit was in operation and the spray booth filter was not in service; and
 - g. an identification of each day during which the high volume, low pressure (HVLP) spray guns were not employed, along with an explanation for not using them.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit during the previous calendar year.

The permittee shall submit annual reports that specify the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, for the previous calendar year.

The permittee shall submit annual reports that specify the total OC emissions for all days during which no photochemically reactive materials were employed.

These annual reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

8 pounds per hour of organic compounds
40 pounds per day of organic compounds

Application Compliance Method:

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

b. Emission Limitation:

14.0 pounds per hour of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

c. Emission Limitation:

61.32 tpy of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.

d. Emission Limitation:

100 tpy of total organic compound emissions for emissions units R001, R002, R003, and R004, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1, A.III.2, and A.III.3.

e. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
 2.41 tpy of particulate emissions
 Applicable Compliance Method:
 Compliance shall be demonstrated by multiplying the allowable particulate emission limitation (0.551 pound per hour) by the actual hours of operation for the year, and then dividing by 2000 pounds per ton.
- g. Emission Limitation:
 20% opacity as a 6-minute average
 Applicable Compliance Method:
 Compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
- h. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0605010093 Emissions Unit ID: R003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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

- 1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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spray booth #1 for coating plastic parts		
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as

specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.3744

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.12

MAGLC (ug/m3): 10,333

Pollutant: ethyl acetate

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 4.7008

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 971.6

MAGLC (ug/m3): 34,285.7

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 7.0928

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1459.6

MAGLC (ug/m3): 14,047.6

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.8096

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 377.24

MAGLC (ug/m3): 4,476.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.). If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0605010093 Emissions Unit ID: R004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #4 for coating plastic parts	OAC rule 3745-31-05 (PTI 06-5609)	Emissions of organic compounds shall not exceed 14.0 pounds per hour on any day during which no photochemically reactive materials (coatings and/or cleanup materials) are employed. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07.
	OAC rule 3745-17-07	See A.I.2.a through A.I.2.d below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Emissions of particulate matter shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which any photochemically reactive materials (coatings and/or cleanup materials), as defined in OAC rule 3745-21-01(C)(5), are employed in this emissions unit.

2. Additional Terms and Conditions

- a. The permittee shall employ high volume, low pressure (HVLP) spray guns except when prohibited by customer demands or specifications.
- b. Emissions of particulate matter shall not exceed 2.41 tpy.
- c. The total emissions of organic compounds for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) are employed shall not exceed 61.32 tpy.

- d. The total emissions of organic compounds from emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
- e. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any operation of this emissions unit.

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II. Operational Restrictions

1. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 100 tons per rolling, 12-month period.
2. The total quantity of organic compounds from coatings and cleanup materials applied in emissions units R001, R002, R003, and R004, combined, shall not exceed 8.33 tons per month.
3. The total quantity of organic compounds applied in emissions units R001, R002, R003, and R004, combined, is equivalent to the total organic compound emissions.
4. The permittee shall demonstrate compliance with the rolling, 12-month organic compound limitation and shall comply with the monthly monitoring and record keeping requirements immediately upon issuance of this permit by using data from the previous 12 months of operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day any photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating, photochemically reactive cleanup material, and nonphotochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the number of gallons of each nonphotochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon;
 - f. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - g. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds per day;
 - h. the total number of hours the emissions unit was in operation;
 - i. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (f)/(h), in pounds per hour (average); and
 - j. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information for each day no photochemically reactive materials (coatings and/or cleanup materials) are employed:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average); and
 - g. whether or not the spray booth filter was in service at all times when the emissions unit was in operation.

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

3. The permittee shall maintain monthly records of the following information:
 - a. the total organic compound emissions from this emissions unit, in pounds (the summation of A.III.1.f, A.III.1.g, and A.III.2.d);
 - b. the total organic compound emissions from this emissions unit for all the days during which no photochemically reactive materials (coatings and/or cleanup materials) were employed, in pounds (the summation of A.III.2.d);
 - c. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, in pounds;
 - d. the total organic compound emissions from this emissions unit, as a rolling, 12-month summation, in pounds; and
 - e. the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, as a rolling, 12-month summation, in pounds.
4. The permittee shall record each day the time periods that the high volume, low pressure (HVLP) spray guns are not employed in this emissions unit, along with an explanation for not using them.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this spray booth:
 - a. for the days during which any photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which any photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. for the days during which no photochemically reactive coatings or cleanup materials were employed, an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 14.0 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - d. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 8.33 tons per month, and the actual organic compound emissions, in tons, for each such month;
 - e. an identification of each month during which the total quantity of organic compound emissions in emissions units R001, R002, R003, and R004, combined, exceeded 100 tons per rolling, 12-month period, and the actual organic compounds emissions, in tons, for each such rolling, 12-month period;
 - f. an identification of each day during which the emissions unit was in operation and the spray booth filter was not in service; and
 - g. an identification of each day during which the high volume, low pressure (HVLP) spray guns were not employed, along with an explanation for not using them.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit during the previous calendar year.

The permittee shall submit annual reports that specify the total organic compound emissions from emissions units R001, R002, R003, and R004, combined, for the previous calendar year.

The permittee shall submit annual reports that specify the total OC emissions for all days during which no photochemically reactive materials were employed.

These annual reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 8 pounds per hour of organic compounds
 - 40 pounds per day of organic compounds

Application Compliance Method:

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

b. Emission Limitation:

14.0 pounds per hour of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

c. Emission Limitation:

61.32 tpy of organic compounds for each day when no photochemically reactive materials (coatings and/or cleanup materials) are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.

d. Emission Limitation:

100 tpy of total organic compound emissions for emissions units R001, R002, R003, and R004, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1, A.III.2, and A.III.3.

e. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

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

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lbs/hr),

M = maximum coating solids usage rate (lbs/hr),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used),

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable particulate emission limitation (0.551 pound per hour) by the actual hours of operation for the year, and then dividing by 2000 pounds per ton.

g. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

h. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the

coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0605010093 Emissions Unit ID: R004 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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

1. None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #1 for coating plastic parts		
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 0.3744

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.12

MAGLC (ug/m3): 10,333

Pollutant: ethyl acetate

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 4.7008

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 971.6

MAGLC (ug/m3): 34,285.7

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 7.0928

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1459.6

MAGLC (ug/m3): 14,047.6

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.8096

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 377.24

MAGLC (ug/m3): 4,476.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

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

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

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

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

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

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None