



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
CLARK COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 08-04507**

**DATE: 8/14/2003**

Visteon Corp Regional Assembly Mfg  
John Hicks  
45000 Helm St B-30  
Plymouth, MI 481706046

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

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

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

RAPCA



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**Permit To Install  
Terms and Conditions**

**Issue Date: 8/14/2003  
Effective Date: 8/14/2003**

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**FINAL PERMIT TO INSTALL 08-04507**

Application Number: 08-04507  
APS Premise Number: 0812100581  
Permit Fee: **\$400**  
Name of Facility: Visteon Corp Regional Assembly Mfg  
Person to Contact: John Hicks  
Address: 45000 Helm St B-30  
Plymouth, MI 481706046

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2020 Progress Dr  
Springfield, Ohio**

Description of proposed emissions unit(s):  
**fuel tank manufacturing operation.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

**Visteon Corp Regional Assembly Mfg**  
**PTI Application: 08-04507**  
**Issued: 8/14/2003**

**Facility ID: 0812100581**

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

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#### 14. Construction Compliance Certification

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

#### 15. Fees

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

### B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic compounds	29.3

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Tank seam coating and edge treatment spray booth	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 6.19 lbs/hour, 148.6 lbs/day and 26.94 tons/year.  See A.2.a  The combined emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act Amendments of 1990 from this emissions unit shall not exceed 20.4 lbs/day and 3.73 tons/year.
	OAC rule 3745-21-07(G)(2)	See B.1.

**2. Additional Terms and Conditions**

- 2.a The 6.19 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

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

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2. The use of HAPs, as listed in Section 112(b) of the Clean Air Act Amendments of 1990, in the saran spray applied in this emissions unit is prohibited.

### **C. Monitoring and/or Recordkeeping Requirements**

1. There are two separate coatings applied to fuel tank seams in this emissions unit; saran and polyurethane. The booth is designed so that all of the OCs applied in the saran coating step will flash off prior to application of the polyurethane coating. All of the OCs employed for clean up are also emitted from this emissions unit. For purposes of calculating the OC emission rates for this emissions unit and the associated oven (P001), the permittee shall utilize a value of 80% as the maximum percentage of the OCs and HAPs employed in this emissions unit from the application of polyurethane coatings that are emitted uncontrolled from the emissions unit. The remaining 20% of the OCs employed in this emissions unit from the application of polyurethane coatings shall be considered to be the uncontrolled emissions for the associated oven. This "split" of OC emissions between this emissions unit and the associated oven is based upon process design parameters and shall be verified according to the testing requirements in Section E.4.
2. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and clean up material employed.
  - b. The number of gallons of each coating and clean up material employed.
  - c. The OC content of each coating and clean up material, as applied, in pounds per gallon.
  - d. The HAP content of each coating and clean up material, as applied, in pounds per gallon.
  - e. The total daily OC emission rate for all non-polyurethane coatings applied and clean up materials, in pounds per day (b x c for saran coating and clean up materials).
  - f. The total (after applying the booth/oven "split") daily OC emission rate for polyurethane

Emissions Unit ID: R001

coatings applied, in pounds per day (  $b \times c \times 0.8$  for polyurethane coatings).

- g. The total (after applying the booth/oven "split") daily OC emission rate for all coatings applied and clean up materials, in pounds per day (  $e + f$ ).
  - h. The total daily HAP emission rate for the clean up materials, in pounds per day (  $b \times d$ ).
  - i. The total (after applying the booth/oven "split") daily HAP emission rate for the polyurethane coating applied, in pounds per day (  $b \times d \times 0.8$ ).
  - j. The total (after applying the booth/oven "split") daily HAP emission rate for the polyurethane coating applied and clean up materials, in pounds per day (  $h + i$ ).
3. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units R001 and P001 combined, and the design parameters of the emissions units 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Toluene

TLV(mg/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.94

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3):167.4

MAGLC( ug/m3): 4,486

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. Each day that the daily OC emissions exceeded 148.6 pounds per day, and the actual daily OC emissions for each such day.

- b. Each day that the daily HAP emissions exceeded 20.4 pounds per day, and the actual daily HAP emissions for each such day.
2. The permittee shall also submit annual reports which specify:
  - a. The total OC emissions from this emissions unit for the previous calendar year.
  - b. The total combined HAP emissions from this emissions unit for the previous calendar year.

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

#### **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):
  - a. Emission Limitation-  
6.19 lbs OC/hour including cleanup  
  
Applicable Compliance Method-  
Compliance shall be determined by summing the maximum hourly emission rates for the application of the "saran spray" and polyurethane. (See i. through iv. below)
    - i. The maximum hourly emission rate for the application of the "saran spray" is determined by multiplying the maximum hourly application rate (0.521 gallons/hour) of the "saran spray" times the maximum OC concentration (7.03 lbs OC/gallon) of the "saran spray".
    - ii. The maximum hourly emission rate for the application of the polyurethane coating is determined by multiplying the maximum hourly application rate (0.552 gallons/hour) of the polyurethane coating times the maximum OC concentration (4.37 lbs OC/gallon) of the polyurethane coating times the booth/oven "split" (0.8) for this emissions unit and the associated oven (P001).
    - iii. The maximum hourly emission rate for the clean up materials employed in this emissions unit is determined by multiplying the maximum hourly clean up material use rate (0.08 gallon/hour) times the maximum OC concentration (7.52 lbs OC/gallon) of the clean up material.
    - iv. The OC emission rate, in lbs/hour, for this emissions unit shall then be the sum of

the results from i. through iii.

- b. Emission Limitation-  
148.6 lbs OC/day including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in term C.2.
  - c. Emission Limitation-  
26.94 tons/year OC emissions including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in terms C.2. and shall be the sum of the 365 daily emission rates for the calendar year and divided by 2,000 pounds per ton.
  - d. Emission Limitation-  
20.4 lbs/day combined HAP emissions including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in term C.2.
  - e. Emission Limitation-  
3.73 tons/year of combined HAP emissions including cleanup  
  
Applicable Compliance Method-  
Compliance shall be based on the record keeping requirements as specified in terms C.2. and shall be the sum of the 365 daily emission rates for the calendar year and divided by 2,000 pounds per ton.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
  3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted within 180 days after emissions unit has achieved maximum production.
    - b. The emission testing shall be conducted to demonstrate compliance with the OC emission

rates for this emissions unit and the associated oven (P001) and the "split" of OC emissions between this emissions unit and emissions unit P001.

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Method 25. If applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

## **F. Miscellaneous Requirements**

None

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - polyurethane curing oven	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.47 lbs/hour, 11.3 lbs/day and 2.1 tons per year.
		See A.2.a
		The combined emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act Amendments of 1990 from this emissions unit shall not exceed 4.82 lbs/day and 0.88 ton/year.
	OAC rule 3745-21-07(G)(1)	The emissions limits established by this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3)

**2. Additional Terms and Conditions**

- 2.a The 0.47 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

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**Visteo**

**PTI A**

**Issued: 8/14/2003**

Emissions Unit ID: **P001**

**B. Operational Restrictions**

1. None

### C. Monitoring and/or Recordkeeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R001), the permittee shall utilize a value of 80% as the maximum percentage of the OCs employed in the spray booth from the application of polyurethane coatings that are emitted uncontrolled from the spray booth. The remaining 20% of the OCs employed in the spray booth from the application of polyurethane coatings shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon process design parameters and shall be verified according to the testing requirements in Section E.4.
2. The permittee shall collect and record the following information for each day for the oven:
  - a. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all polyurethane coatings employed in the coating operation (R001) associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (20% as defined in Section C.1 of this permit), in pounds per day.
  - b. the total potential (prior to applying the booth/oven "split") daily HAP emission rate for all polyurethane coatings employed in the coating operation (R001) associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (20% as defined in Section C.1 of this permit), in pounds per day.
3. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units R001 and P001 combined, 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 approval 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 summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Toluene

TLV(mg/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 2.94

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3):167.4

MAGLC( ug/m3): 4,486

Physical changes to or changes in the method of operation of the emissions unit after its installation of 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 the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. Each day that the daily OC emissions exceeded 11.3 pounds per day, and the actual daily OC emissions for each such day.
  - b. Each day that the daily HAP emissions exceeded 4.82 pounds per day, and the actual daily OC emissions for each such day.
2. The permittee shall also submit annual reports which specify:
  - a. The total OC emissions from this emissions unit for the previous calendar year.
  - b. The total combined HAP emissions from this emissions unit for the previous calendar year..

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

#### **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):
  - a. Emission Limitation-  
0.47lb OC/hour  
  
Applicable Compliance Method-  
Compliance shall be determined by multiplying the total (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all polyurethane coatings employed in the coating operation (R001) associated with this emissions unit multiplied by the booth /oven "split" of 20%.
  - b. Emission Limitation-  
11.3 lbs OC/day

## Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in term C.2.

- c. Emission Limitation-  
2.1 TPY of OC

## Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in term C.2. and shall be the sum of the 365 daily emission rates for the calendar year, divided by 2,000 lbs per ton.

- d. Emission Limitation-  
4.82 lbs OC/day combined HAP

## Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in term C.2.

- e. Emission Limitation-  
0.88 ton per year combined HAP

## Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in term C.2. and shall be the sum of the 365 daily emission rates for the calendar year, divided by 2,000 lbs per ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 180 days after emissions unit has achieved maximum production.
  - b. The emission testing shall be conducted to demonstrate compliance with the OC emission rates for this emissions unit and the associated oven (P001) and the "split" of OC emissions between this emissions unit and emissions unit R001.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Method 25. If applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum

capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

**F. Miscellaneous Requirements**

None