

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **08-04324**

A. Source Description

P014, P031, and P041 are sealing compound machines that apply adhesive to the metal ends of automotive filters. P041 was permitted through a previous PTI (08-2195, issued 11/20/91) and P014 and P031 are both existing sources. Federally enforceable emission limitations were previously established for P014, P031, and P041 in a FESOP issued February 23, 2001.

B. Facility Emissions and Attainment Status

Honeywell CPG, Fram Operations is located in Greenville, Darke County which is currently in attainment for all criteria pollutants. The facility has requested a synthetic minor PTI to limit HAPs emissions below Title V thresholds. The terms and conditions of this permit will limit facility-wide HAPs emissions to below 9.9 TPY for an individual HAP and below 24.9 TPY for a combination of HAPs, based on a rolling 12-month summation. With issuance of this synthetic permit and an additional synthetic minor PTI currently under review (PTI 08-04315), facility-wide combined HAPs potential to emit will equal 22.20 TPY.

C. Source Emissions

P014, P031, and P041 each employ a sealing compound that is 80% MEK, by weight. Honeywell has proposed to limit sealant usage for each of these emissions units to remain below the 9.9 TPY facility-wide individual HAP emission limitation. Maximum allowable sealant usage is 1 gallon/day and 150 gallons/yr for P014, 4.5 gallons/day and 1125 gallons/yr for P031, and 8 gallons/day and 2000 gallons/yr for P041. Allowable lb/day and TPY MEK emissions were calculated from allowable sealant usages. Total annual MEK allowable emissions from this PTI equal 9.57 TPY. Annual sealant usages and TPY MEK emissions are based on 12-month, rolling summations to ensure federal enforceability.

D. Conclusion

This PTI is being recommended for issuance as a synthetic minor permit to avoid TV. By limiting facility-wide individual HAP and combined HAPs emissions below 9.9 TPY and 24.9 TPY, respectively, the facility is avoiding TV applicability. Compliance with the emission limitations of this synthetic minor permit will be monitored through rolling, 12-month summations of the following: annual MEK emissions from P014, P031, and P041; annual sealant usage rates from P014, P031, and P041; and annual facility-wide individual HAP and combined HAPs emissions.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
DARKE COUNTY
Application No: 08-04324

DATE: 12/18/2001

Honeywell CPG Fram Corp
Timothy Collette
P.O. Box 100
Greenville, OH 45331-0100

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$800 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Handwritten signature of Thomas G. Rigo

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

CC: USEPA RAPCA Miami Valley Reg Plan Comm IN



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04324

Application Number: 08-04324
APS Premise Number: 0819070018
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honeywell CPG Fram Corp
Person to Contact: Timothy Collette
Address: P.O. Box 100
Greenville, OH 45331-0100

Location of proposed air contaminant source(s) [emissions unit(s)]:

**851 Jackson St
Greenville, Ohio**

Description of proposed emissions unit(s):

P038 and P041 sealing compound machines chapter 31 replacing 08-1999 issued 5-9-90 and 08-2195 issued 11-20-91; P014 and P031 sealing compound machines to decrease-increase VOCs.

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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

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Emissions Unit ID: **P014**

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

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>
VOC and HAPs	9.57
facility-wide	9.9
individual HAPs	
facility-wide	24.9
combined HAPs	

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>
P014 - Sealing Compound Machine No. 2c -Heavy Duty West	OAC rule 3745-31-02(A)(2)	5.84 lbs/day volatile organic compounds (VOC)*
	less than or equal to 1 gallon/day (7.3 lbs) sealant usage	
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	0.44 TPY VOC, as a rolling, 12-month summation
		150 gallons (1095 lbs)/yr sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not

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Emissions Unit ID: **P014**

necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

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Emissions Unit ID: P014

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 1 gallon (7.3 lbs).
4. The annual sealant usage shall not exceed 150 gallons (1095 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	12.5 gallons (91 lbs sealant)
1 - 2	25 gallons (183 lbs sealant)
1 - 3	37.5 gallons (274 lbs sealant)
1 - 4	50 gallons (365 lbs sealant)
1 - 5	62.5 gallons (456 lbs sealant)
1 - 6	75 gallons (548 lbs sealant)
1 - 7	87.5 gallons (639 lbs sealant)
1 - 8	100 gallons (730 lbs sealant)
1 - 9	112.5 gallons (821 lbs sealant)
1 - 10	125 gallons (913 lbs sealant)
1 - 11	137.5 gallons (1004 lbs sealant)
1 - 12	150 gallons (1095 lbs sealant)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:

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Emissions Unit ID: **P014**

- a. The name and identification of each sealant employed.
- b. The volume, in gallons, of each sealant employed.
- c. The total volume, in gallons, of all sealants employed.

- d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
2. The permittee shall collect and record the following information each month for the sealant machine:
- a. The total sealant usage for the month, in gallons.
 - b. The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC emission rate for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC emission rates.
3. The permittee shall collect and record the following information each month for the entire facility:
- a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to

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Emissions Unit ID: **P014**

Issued: To be entered upon final issuance

be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P014) 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1036

MAGLC (ug/m³): 14,042

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.

- 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.

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Emissions Unit ID: **P014**

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5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
 - 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. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each day during which the daily VOC emission rate exceeded the 5.84 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 1 gallon/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 0.44 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 150 gallons/yr rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. For the first 12 calendar months of operation following issuance of this permit, an identification of all exceedances of the maximum allowable cumulative sealant usage limitations.
 - f. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each

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Emissions Unit ID: **P014**

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such month.

- g. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

3. The permittee shall also submit annual reports which specify the following:

- a. The total sealant usage for this emissions unit.
- b. The VOC emissions for this emissions unit.
- c. The individual HAP emissions from the facility.
- d. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation -
5.84 lbs/day VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

- b. Emission Limitation -
0.44 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

- c. Emission Limitation -
1 gallon/day (7.3 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

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- d. Emission Limitation -
150 gallons/year (1095 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.

- e. Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.

- f. Emission Limitation -
less than 9.9 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

- g. Emission Limitation -
less than 24.9 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

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Emissions Unit ID: **P014**

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F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.

2. This permit is being issued for emissions units P014, P031, P038, and P041. P038 (#2 Compound Machine, Di-tech) shall only employ sealants that are water-based and that contain no VOCs and no HAPs. No terms and conditions are being developed for emissions unit P038, and no monitoring and/or record keeping is required. The requirements of this PTI for emissions units P014, P031, P038, and P041 supercede the requirements of the FESOP that was issued February 23, 2001.

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PTI

Emissions Unit ID: P031

Issued: To be entered upon final issuance

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>
P031 - Sealing Compound Machine No. 1- Heavy Duty West	OAC rule 3745-31-02(A)(2)	26.24 lbs/day volatile organic compounds (VOC)* less than or equal to 4.5 gallons/day (32.8 lbs) sealant usage
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	3.29 TPY VOC, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	1125 gallons (8213 lbs)/yr sealant usage, as a rolling, 12-month summation The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

Honeywell CPG Fram Corp
PTI
Issue

Facility ID: 0819070018

Emissions Unit ID: P031

* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

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Emissions Unit ID: P031

B. Operational Restrictions

7. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 4.5 gallons (32.8 lbs).
4. The annual sealant usage shall not exceed 1125 gallons (8213 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	94 gallons (686 lbs sealant)
1 - 2	187.5 gallons (1369 lbs sealant)
1 - 3	281 gallons (2051 lbs sealant)
1 - 4	375 gallons (2738 lbs sealant)
1 - 5	469 gallons (3424 lbs sealant)
1 - 6	562.5 gallons (4106 lbs sealant)
1 - 7	656 gallons (4789 lbs sealant)
1 - 8	750 gallons (5475 lbs sealant)
1 - 9	844 gallons (6161 lbs sealant)
1 - 10	937.5 gallons (6844 lbs sealant)
1 - 11	1031 gallons (7526 lbs sealant)
1 - 12	1125 gallons (8213 lbs sealant)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:

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Emissions Unit ID: **P031**

- a. The name and identification of each sealant employed.
- b. The volume, in gallons, of each sealant employed.

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- c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
2. The permittee shall collect and record the following information each month for the sealant machine:
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC emission rate for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC emission rates.
3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P031) 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1036

MAGLC (ug/m³): 14,042

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

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Emissions Unit ID: **P031**

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an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled.

- 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

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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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
 - 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. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each day during which the daily VOC emission rate exceeded the 26.24 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 4.5 gallon/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 3.29 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 1125 gallons/year rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. For the first 12 calendar months of operation following issuance of this permit, an identification of all exceedances of the maximum allowable cumulative sealant usage limitations.

- f. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - g. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
 3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

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Issued: To be entered upon final issuance

Emissions Unit ID: P031

- b. Emission Limitation -
3.29 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.
- c. Emission Limitation -
4.5 gallons/day (32.8 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.
- d. Emission Limitation -
1125 gallons/year (8213 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.
- e. Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.
- f. Emission Limitation -
less than 9.9 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

- g. Emission Limitation -
less than 24.9 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

Hone

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Issued: To be entered upon final issuance

Emissions Unit ID: **P031**

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. This permit is being issued for emissions units P014, P031, P038, and P041. P038 (#2 Compound Machine, Di-tech) shall only employ sealants that are water-based and that contain no VOCs and no HAPs. No terms and conditions are being developed for emissions unit P038, and no monitoring and/or record keeping is required. The requirements of this PTI for emissions units P014, P031, P038, and P041 supercede the requirements of the FESOP that was issued February 23, 2001.

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Emissions Unit ID: P041

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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>
P041 - Sealing Compound Machine No. 6- Heavy Duty West	OAC rule 3745-31-05(A)(3)	46.72 lbs/day volatile organic compounds (VOC)*
		less than or equal to 8 gallons/day (58.4 lbs) sealant usage
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	5.84 TPY VOC, as a rolling, 12-month summation
		2000 gallons (11,680 lbs)/yr sealant usage, as a rolling, 12-month summation
OAC rule 3745-21-09(U)(2)(e)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

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Emissions Unit ID: **P041**

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* All VOC for this emissions unit is methyl ethyl ketone (MEK). Therefore it is not necessary for the permittee to maintain records of the combined HAP emissions for this emissions unit.

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Issued: To be entered upon final issuance

Emissions Unit ID: P041

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 8 gallons (7.3 lbs).
4. The annual sealant usage shall not exceed 2000 gallons (14,600 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	167 gallons (1219 lbs sealant)
1 - 2	333 gallons (2431 lbs sealant)
1 - 3	500 gallons (3650 lbs sealant)
1 - 4	667 gallons (4869 lbs sealant)
1 - 5	833 gallons (6081 lbs sealant)
1 - 6	1000 gallons (7300 lbs sealant)
1 - 7	1167 gallons (8519 lbs sealant)
1 - 8	1333 gallons (9731 lbs sealant)
1 - 9	1500 gallons (10,950 lbs sealant)
1 - 10	1667 gallons (12,169 lbs sealant)
1 - 11	1833 gallons (13,381 lbs sealant)
1 - 12	2000 gallons (14,600 lbs sealant)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:

Honeywell CPG Fram Corp
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Emissions Unit ID: **P041**

- a. The name and identification of each sealant employed.
- b. The volume, in gallons, of each sealant employed.

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- c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC emissions, in pounds per day [i.e. the sum of (b x d) for all sealants employed].
2. The permittee shall collect and record the following information each month for the sealant machine:
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC emissions from all sealants employed, in tons [i.e. the sum of the daily VOC emissions as recorded in Section C.1.e. above, divided by 2000 lbs/ton].
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC emission rate for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC emission rates.
3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
 - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of

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the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit (P041) 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" pollutants:

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1036

MAGLC (ug/m³): 14,042

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.
- 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

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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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
 - 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. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of each day during which the daily VOC emission rate exceeded the 46.72 lbs/day emission limitation, and the actual daily VOC emission rate for each such day.
 - b. An identification of each day during which the daily sealant usage exceeded the 8 gallons/day maximum sealant usage limitation, and the actual daily sealant usage for each such day.
 - c. An identification of each month during which the rolling, 12-month VOC emission rate exceeded the 5.84 TPY rolling, 12-month VOC emission limitation, and the actual rolling, 12-month VOC emission rate for each such month.
 - d. An identification of each month during which the rolling, 12-month sealant usage exceeded the 2000 gallons/year rolling, 12-month sealant usage limitation, and the actual rolling, 12-month sealant usage for each such month.
 - e. For the first 12 calendar months of operation following issuance of this permit, an identification of all exceedances of the maximum allowable cumulative sealant usage limitations.

- f. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
 - g. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
 3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.

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Emissions Unit ID: **P041**

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- b. Emission Limitation -
5.84 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.
- c. Emission Limitation -
8 gallons/day (58.4 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.1. of this permit.
- d. Emission Limitation -
2000 gallons/year (14,600 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section C.2. of this permit.
- e. Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.
- f. Emission Limitation -
less than 9.9 TPY of any individual HAP from this facility as a rolling, 12-month summation

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Emissions Unit ID: **P041**

Issued: To be entered upon final issuance

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

- g. Emission Limitation -
less than 24.9 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in Section C.3. of this permit. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. This permit is being issued for emissions units P014, P031, P038, and P041. P038 (#2 Compound Machine, Di-tech) shall only employ sealants that are water-based and that contain no VOCs and no HAPs. No terms and conditions are being developed for emissions unit P038, and no monitoring and/or record keeping is required. The requirements of this PTI for emissions units P014, P031, P038, and P041 supercede the requirements of the FESOP that was issued February 23, 2001.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04324 Facility ID: 0819070018

FACILITY NAME Honeywell CPG Fram Corp

FACILITY DESCRIPTION P038 and P041 sealing compound machines chapter 31 replacing 08-1999 issued 5-9-90 and 08-2195 issued 11-20-91; P014 and P031 sealing compound machines to decrease-increase VOCs. CITY/TWP Greenville

SIC CODE 3714 SCC CODE 40202501 EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION Sealing Compound Machine No. 2c -Heavy Duty West

DATE INSTALLED upon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			5.84 lb VOC (as MEK)/day	0.44
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with applicable OAC rules and allowable mass emission limitations; sealant usage restriction; recordkeeping; reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methyl ethyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 08-04324 Facility ID: 0819070018

FACILITY NAME Honeywell CPG Fram Corp

FACILITY DESCRIPTION P038 and P041 sealing compound CITY/TWP Greenville

Emissions Unit ID: P041

machines to decrease-increase VOCs.

SIC CODE 3714 SCC CODE 40202501 EMISSIONS UNIT ID P031

EMISSIONS UNIT DESCRIPTION Sealing Compound Machine No. 1- Heavy Duty West

DATE INSTALLED upon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			26.24 lb VOC (as MEK)/day	3.29
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with applicable OAC rules and allowable mass emission limitations; sealant usage restriction; recordkeeping; reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methyl ethyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 08-04324 Facility ID: 0819070018

FACILITY NAME Honeywell CPG Fram Corp

FACILITY DESCRIPTION P038 and P041 sealing compound CITY/TWP Greenville

Emissions Unit ID: **P041**

machines to decrease-increase VOCs.

SIC CODE 3714 SCC CODE 40202501 EMISSIONS UNIT ID P041

EMISSIONS UNIT DESCRIPTION Sealing Compound Machine No. 6- Heavy Duty West

DATE INSTALLED 06/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			46.72 lb VOC (as MEK)/day	5.84
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with applicable OAC rules and allowable mass emission limitations; sealant usage restriction; recordkeeping; reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methyl ethyl ketone