



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
DARKE 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: 08-04324**

**DATE: 1/31/2002**

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

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 1/31/2002  
Effective Date: 1/31/2002**

**FINAL PERMIT TO INSTALL 08-04324**

Application Number: 08-04324  
APS Premise Number: 0819070018  
Permit Fee: **\$800**  
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 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

**Honeywell CPG Fram Corp**  
**PTI Application: 08-04324**  
**Issued: 1/31/2002**

**Facility ID: 0819070018**

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**

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 thirty (30) days after commencing operation of the emissions unit(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 facility-wide	9.57 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.

8

**Honey**

**PTI A**

**Issued: 1/31/2002**

Emissions Unit ID: **P014**

\* 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.

**Honey**  
**PTI A**  
**Issued: 1/31/2002**

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:

**Honeywell CPG Fram Corp**  
**PTI Application: 08 04324**  
**Issued**

**Facility ID: 0819070018**

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

12

**Honey**

**PTI A**

**Issued: 1/31/2002**

Emissions Unit ID: **P014**

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 (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/m<sup>3</sup>): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1036

MAGLC (ug/m<sup>3</sup>): 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

**Honeywell CPG Fram Corp**  
**PTI Application: 08 04324**  
**Issued**

**Facility ID: 0819070018**

Emissions Unit ID: **P014**

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.

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**

5. 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 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.

f. 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

**Honeywell CPG Fram Corp**  
**PTI Application: 08 04224**  
**Issued**

**Facility ID: 0819070018**

Emissions Unit ID: **P014**

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.
- 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.

**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.

## 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  1125 gallons (8213 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.

**Honeywell CPG Fram Corp**  
**PTI Application: 08 04324**  
**Issued**

**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.

**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 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:

- 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 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/m<sup>3</sup>): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1036

MAGLC (ug/m<sup>3</sup>): 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 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.

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.

Emissions Unit ID: **P031**

- 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.
- b. 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.

- 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.

**Honeywell CPG Fram Corp**  
**PTI Application: 08-04324**  
**Issued**

**Facility ID: 0819070018**

**Emissions Unit ID: P031**

- 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.

## 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)*
	OAC rule 3745-35-07(B) Synthetic minor to avoid Title V	less than or equal to 8 gallons/day (58.4 lbs) sealant usage  5.84 TPY VOC, as a rolling, 12- month summation
	OAC rule 3745-21-09(U)(2)(e)	2000 gallons (11,680 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 3745-31-05(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.

33

**Honey**

**PTI A**

**Issued: 1/31/2002**

Emissions Unit ID: **P041**

\* 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.

## **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**  
**PTI Application: 08 04324**  
**Issued**

**Facility ID: 0819070018**

Emissions Unit ID: **P041**

- 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 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/m<sup>3</sup>): 589.8

Maximum Hourly Emission Rate (lbs/hr): 2.29

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1036

MAGLC (ug/m<sup>3</sup>): 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.

**Honeywell CPG Fram Corp**  
**PTI Application: 08-04324**  
**Issued**

**Facility ID: 0819070018**

Emissions Unit ID: **P041**

- 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.

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.

- 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
- 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

**Honeywell CPG Fram Corp**  
**PTI Application: 08-04324**  
**Issued**

**Facility ID: 0819070018**

Emissions Unit ID: **P041**

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.