State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
DARKE COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 08-04719
Fac ID: 0819070190

DATE: 10/6/2005

Greenville Technology Inc
Les Siegler
5755 St Rte 571 East
Greenville, OH 453319691

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 of 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 **$400** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **RAPCA** **Miami Valley Regional Planning Commission** **IN**

DRAFT PERMIT TO INSTALL 08-04719

Application Number:	08-04719
Facility ID:	0819070190
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Greenville Technology Inc
Person to Contact:	Les Siegler
Address:	5755 St Rte 571 East Greenville, OH 453319691

Location of proposed air contaminant source(s) [emissions unit(s)]:
5755 S Rte 571 East
Greenville, Ohio

Description of proposed emissions unit(s):
New robotic coating line.

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

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Record keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or

required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

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 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 <u>obtained before</u> 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping of state-only enforceable 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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 (i.e., postmarked) quarterly, 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. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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

Pollutant	Tons Per Year
OC	56.57
Single HAP	9.9
Combined HAP	24.9

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products 40 CFR Part 63, Subpart PPPP was promulgated April 19, 2004. Greenville Technology, Inc. is an "existing" major source per the definitions of the MACT with a compliance date of three years after April 19, 2004 (i.e., April 19, 2007). This PTI will be issued as a synthetic minor containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below MACT thresholds allowing the facility to avoid the MACT requirements.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: **R001**

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer	OAC rule 3745-31-05(A)(3)	The organic compound emissions (OC) shall not exceed 12.50 lbs/hr, excluding cleanup for this emissions unit and 56.57 TPY, including cleanup for this emissions unit. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(1) and 3745-21-07(G)(2). See Sections A.I.2.a. through b. below.
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid a MACT standard)	The emissions of hazardous air pollutants (HAP) shall not exceed 9.9 TPY for a single HAP and 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.
	OAC rule 3745-21-07(G)(1) and OAC rule 3745-21-07(G)(2)	The control efficiencies specified by these rules are less stringent than the efficiencies established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 12.50 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary

to develop record keeping and reporting requirements to ensure compliance with this limitation.

2.b The OC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency, and a fume concentrator and a regenerative thermal oxidizer system with a minimum 90% removal/destruction efficiency, to achieve a minimum 90% overall control efficiency.

2.c Emissions units K001, K007 and R001 will share the DURR fume concentrator wheel and regenerative thermal oxidizer system to abate OC emissions.

II. Operational Restrictions

1. A permanent total enclosure shall be constructed to enclose the coating application stations, all sources of emissions, and all areas from the application station to the oven. If the oven is operated under negative pressure, it does not need to be enclosed as long as there is no leakage between the coating application and the oven. Air flow monitor(s) or differential pressure gauge(s) shall be installed to continuously measure and record the average facial velocity or pressure differential across the enclosure in accordance with 40 CFR Part 51, Appendix M, Method 204 . The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

2. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed, installed, maintained, and operated in accordance with 40 CFR Part 51, Appendix M, Method 204, whenever the emissions unit is in operation. The permanent total enclosure shall meet all of the following criteria :

a. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each OC emitting point;

b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;

c. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity through all natural draft openings being no less than 3,600 m/hr (200 fpm) corresponding to a pressure drop of 0.013 mm Hg (0.007 in.H2O);

d. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in (b) and are not included

in the calculation in paragraph (c), shall be completely closed to any air movement during process operations; and

e. All OC emissions shall be captured and contained for discharge through the control device.

By satisfying the above criteria for a permanent total enclosure, the OC capture efficiency shall be assumed to be 100%.

3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 inch of water), as a 3-hour average, whenever the emissions unit is in operation.

4. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

5. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be not more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance

6. The average temperature of the desorption air stream to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 230 degrees Fahrenheit.

7. The number of revolutions per hour (RPH) of the fume concentrator shall be continuously maintained, when the emissions unit is in operation, at a value within +/-1 RPH (where 10 Hertz Equals 1 RPH) of the value established during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature at the followings locations when the emission unit is in operations:

a. The temperature of the exhaust gases in the combustion zone of the thermal incinerator; and

b. The temperature of the desorption air stream prior to the fume concentrator wheel.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the

manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permitte shall collect and record the average temperature from the monitoring locations listed in a and b above for each 3-hour blocks of time.

2. The permittee shall collect and record the following information each day for the coating line and control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit is in operation, was less than 1500 degrees Fahrenheit, or more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

c. All 3-hour blocks of time during which the average temperature of the desorption air stream prior to the fume concentrator wheel, when the emissions unit is in operation, was less than 260 degrees Fahrenheit.

3. The permittee shall perform daily checks, when this emissions unit is in operation, to verify the concentrator wheel RPH by way of manually recording the HZ setting, where 10 HZ equals 1 RPH. This verification shall be noted in an operations log.

4. The permittee shall perform a manual check of the rotational speed of the fume concentrator wheel at least once per calendar quarter. This check, and the determined RPH shall be noted in an operations log. [This quarterly check is performed to document the RPH and to verify the accuracy of the HZ readings conducted pursuant to Section A.III.3 above.]

5. The permittee shall record and maintain the following information on a daily basis:

a. The average facial velocity of the air flow through or the pressure differential across the enclosure; and

b. All 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the average facial velocity of 3,600 meters per hour (200

feet per minute) or the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

6. The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. The measured surface area of each natural draft opening;

b. The distance measured from each natural draft opening to each OC emitting point;

c. The total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. The calculation or demonstration that the distance from each OC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. The calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

7. The permittee shall collect and record the following information each month for this emission unit for the purpose of determining annual OC emissions:

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

b. The number of gallons of each coating material employed;

c. The OC content of each coating material employed, in pounds per gallon;

d. The name and company identification of each cleanup material employed;

e. The number of gallons of each cleanup material employed;

f. The OC content of each cleanup material employed, in pounds per gallon;

g. The total uncontrolled OC usage rate (OC input rate) for all coatings and cleanup employed [i.e., the summation of (b x c) + (e x f) for all materials], in tons; and

h. The total calculated controlled OC emission rate for all coatings and cleanup materials, in tons (the controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in

compliance [i.e., (g) multiplied by a factor of (1 - the overall control efficiency)].

8. The permittee shall collect and record the following information each month for the entire facility for the purpose of determining the HAP* emissions:

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

b. The individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied;

c. The total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied;

d. The number of gallons of each coating material employed;

e. The name and company identification of each cleanup material employed;

f. The individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied;

g. The total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied;

h. The number of gallons of each cleanup material employed;

i. The after control total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of (b x d) + (f x h), multiplied by (1 - the overall control efficiency)], in tons;

j. The after control total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of © x d) + (g x h), multiplied by (1 - the overall control efficiency)], in tons;

k. The rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year; and

l. The rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in

tons per year.

The after control HAP emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

*A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation (excursion) reports that identify any of the following when the emissions unit was in operation:

a. Identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in this permit; and

b. Identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the fume concentrator wheel did not comply with the temperature limitation specified in this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following information for the fume concentrator wheel when the emissions unit was in operation:

a. Identification of each day during which the RPH (as determined by the HZ monitoring) of the fume concentrator did not comply with the requirement established in Section A.II.7 of this permit;

b. Identification of each quarter during which the manual check of the actual rotational speed of the fume concentrator (RPH) did not indicate compliance with the value specified in this permit established in Section A.II.7 of this permit and/or did not correspond to 1 RPH for every 10 HZ (see Section A.III.4); and

c. The corrective actions taken to reestablish the proper rotational speed (RPH) for the fume concentrator; and

3. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following information for the permanent total enclosure when the emissions unit was in operation:

a. Any period of time in which a natural draft opening to the enclosure was located at a distance of less than four equivalent opening diameters, or less than 4 times the diameter of the opening, from any OC emitting point;

b. Any period of time in which the total area of all natural draft openings exceeded 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;

c. Any period of time in which the average facial velocity of the air flow into the enclosure was less than 3,600 meters per hour (200 feet per minute) or identify all 3-hour blocks of time during which the enclosure was not maintained at the minimum pressure differential of 0.013 mm Hg (0.007 inch of water), as a 3-hour average;

d. Any period of time in which an access door or window to the enclosure, that does not meet the requirements of a natural draft opening and whose surface area was not included in the 5 percent surface area determination, was not completely closed to air movement;

e. Any period of time in which any access doors or windows were opened during process operations;

The report shall include the date and number of hours that the emissions unit was operating under each non-compliant scenario.

4. The permittee shall submit quarterly summary reports that identify any of the following records when the emissions unit was in operation:

a. A summary which includes a log of the downtime for the capture (collection) system, control device, and monitoring equipment;

b. Any period of times in which less than 100% of the OC emissions were captured for discharge through the control device or the control device was bypassed;

c. Identification of any exceedances of the HAPs emission limits.

5. In accordance with the General Terms and Conditions of this permit, the above quarterly deviation reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

6. The permittee shall submit annual reports which specify the total organic compound

emissions from this emissions unit, the individual HAP emissions from the facility, and the combined HAPs emissions from the facility. These reports shall be submitted by January 31 of each year and shall cover for the previous calendar year.

V. 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-
The organic compound emissions from this emissions unit shall not exceed 12.50 pound per hour OC, excluding cleanup.

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum as applied coating usage rate of 22 gal/hour multiplied by the worst case coating OC content of 5.7 lb/gal, and then multiplied by the minimum required overall control efficiency of (1-0.90).

b. Emission Limitation-
The organic compound emissions from this emissions unit shall not exceed 56.57 tons per year, including cleanup.

Applicable Compliance Method-
Compliance shall be determined by the record keeping as specified in Section III.7 of this permit.

c. Emission Limitation-
The emissions of hazardous air pollutants (HAP) shall not exceed 9.9 TPY for a single HAP and 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.

Applicable Compliance Method-
Compliance shall be demonstrated be record keeping in Terms III.8 of this permit.

2. The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on this emissions unit within six months prior to the Title V permit expiration date of June 6, 2006, in accordance with the following requirements:

a. Emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate and minimum overall control efficiency of 90% for organic compounds. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR Part 60, Appendix A and Method 25 or 25A of 40 CFR Part 60, Appendix

A, as appropriate, before and after the fume concentrator and regenerative thermal oxidizer, to demonstrate compliance with the destruction efficiency for volatile organic compounds. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. A compliance demonstration for the permanent total enclosure shall be conducted to demonstrate compliance with the capture efficiency requirement. The following test method(s) shall be employed to demonstrate compliance: Method 204 of 40 CFR Part 60, Appendix A to demonstrate the permanent total enclosure can achieve 100% capture efficiency.

3. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through, or the average pressure differential across, the natural draft openings in accordance with 40 CFR Part 51, Appendix M, Method 204. The continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration by checking the direction of air flow through the use of streamers, smoke tubes, or tracer gases at each natural draft opening. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeter using smoke tubes or tracer gases.

The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening during the compliance demonstration:

a. The measured surface area of each natural draft opening;

b. The distance measured from each natural draft opening to each OC emitting point in the process;

c. The distance measured from each exhaust duct or hood in the enclosure to each natural draft opening; and

d. The total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling.

4. In accordance with 40 CFR Part 51, Appendix M, Method 204, compliance with the requirements with for a permanent total enclosure shall be demonstrated if the following determinations are documented during testing:

a. The average facial velocity of the air flow into the enclosure is maintained at a minimum of 3,600 m/hr (200 feet per minute) or at a minimum pressure differential of 0.013 mm Hg (0.007 in. of water);

b. Each natural draft opening is at a distance of at least four equivalent opening diameters, or 4 times the diameter of the opening, from each OC emitting point in the process;

c. The sum of the surface areas of all of the natural draft openings in the total enclosure are not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling; calculated by dividing the total area of all natural draft openings by the total inside surface area of the enclosure;

d. There is no leakage detected at any of the closed access doors and windows, and it is certified that they always remain closed during process operations; and

e. All OC emissions captured by the permanent total enclosure are entirely vented for discharge through the control device.

5. The emissions and compliance demonstration testing tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

6. Formulation data shall be used to determine the HAP and organic compound contents of the coating and cleanup materials. If formulation data is not available and/or if required by the regulating agency, Method 24 or 24A of 40 CFR Part 60, Appendix A shall be conducted for the organic content of the solvent materials applied. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

1. Emissions units K002 and K005 will be permanently shut down upon start up of emissions unit R001.

Emissions Unit ID: **R001**

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer	Compliance with Ohio EPA's "Air Toxic Policy"	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m^3): 188,750

Maximum Hourly Emission Rate (lbs/hr): 15.01

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 38.17

MAGLC (ug/m^3): 4494

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

change.

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

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

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

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: **R001**

NEW SOURCE REVIEW FORM B

PTI Number: 08-04719 Facility ID: 0819070190

FACILITY NAME Greenville Technology Inc

FACILITY DESCRIPTION New robotic coating line. CITY/TWP Greenville

SIC CODE 3714 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer

DATE INSTALLED installation began 7/2005; operation to begin after issuance of PTI

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	12.50 lb/hr	56.57	12.50 lb/hr	56.57
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?

Enter Determination: Compliance with OAC rules, specified emission rates; use of permanent total enclosure; use of fume concentrator and regenerative thermal oxidizer; monitoring, record keeping and 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: ethylhexyl acetate, isobutyl acetate, methyl ethyl ketone, n-butyl acetate, toluene, xylene, methyl amyl ketone, ethyl benzene