

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

Permit To Install **03-17069**

A. Source Description

DTR Industries, Inc. has proposed to install an automatic adhesive spray machine (K062), an automatic water-borne paint spray machine (K063) and a glycol dip tank with steam cleaning operation (P074). The company has requested federally enforceable limitations to restrict the potential to emit organic compounds (OC) from all three emissions units.

The automatic adhesive spray machine will have federally enforceable limitations of 2.45 tons per rolling 12-month period from primer coating operations and 2.65 tons per rolling 12-month period from topcoat operations. The automatic water-borne paint spray machine will have a federally enforceable limitation of 1.20 tons per rolling 12-month period. The glycol dip tank will have a federally enforceable limitation of 2.50 tons of OC per rolling 12-month period, based upon a maximum of 694,444 parts produced per rolling 12-month period.

B. Facility Emissions and Attainment Status

DTR Industries, Inc. is considered a 'major' facility for Title V, MACT and PSD purposes. Allen County is designated non-attainment for ozone (includes NOx) and is attainment for all criteria pollutants.

C. Source Emissions

Installation of the automatic adhesive spray machine, the automatic water-borne paint spray machine, and the glycol dip tank will result in an increase in OC emissions at DTR Industries, Inc., of 9.64 tons per year. Additionally, several other installations over the past 12 months have resulted in a combined OC emissions increase of 29.40 tons per year. All projects combined will result in a facility increase of 39.04 tons of OC per year.

D. Conclusion

Installation of the three new emissions units, along with the previous installation of three additional emissions units at DTR Industries, Inc. over the past 12 months, will result in a facility-wide increase in OC emissions of 39.04 tons per year. This is below the significance threshold of 40 tons per year. Therefore, PSD permitting requirements will not be triggered.



State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL

ALLEN COUNTY

Application No: 03-17069

Fac ID: 0302000166

DATE: 2/23/2006

DTR Industries Inc
Kevin Gearig
320 Snider Rd
Bluffton, OH 45817

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
40 CFR Part 63 Subpart M	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** 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

ALLEN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17069 FOR AN AIR CONTAMINANT SOURCE FOR
DTR Industries Inc**

On 2/23/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **DTR Industries Inc**, located at **320 Snider Rd, Bluffton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17069:

Automatic Adhesive Spray Machine, Automatic Water-Borne Paint Spray Machine, and Submerged Assembly Machine.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-17069

Application Number: 03-17069
Facility ID: 0302000166
Permit Fee: **To be entered upon final issuance**
Name of Facility: DTR Industries Inc
Person to Contact: Kevin Gearig
Address: 320 Snider Rd
Bluffton, OH 45817

Location of proposed air contaminant source(s) [emissions unit(s)]:
**320 Snider Rd
Bluffton, Ohio**

Description of proposed emissions unit(s):
Automatic Adhesive Spray Machine, Automatic Water-Borne Paint Spray Machine, and Submerged Assembly Machine.

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

1. Monitoring and Related Recordkeeping 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 recordkeeping 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 emission limitations, operational restrictions, and control device operating parameter limitations, 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.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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 obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- 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 recordkeeping 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 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 (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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	9.64
PE	1.10

DTR Industries Inc

PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

This facility is subject to 40 CFR Part 63, Subpart M MMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart M MMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart M MMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart M MMM and Subpart A. All the requirements of 40 CFR Part 63, Subpart M MMM are specified in Attachment A.

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

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K062 - automatic adhesive spray machine - miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)(3)	63.00 lbs of organic compounds(OC)/day from primer coating operations; 67.70 lbs of OC/day from topcoat coating operations 139.5 lbs of OC/month; 0.84 ton of OC/year from the use of cleanup materials 0.08 lb of particulate emissions (PE)/hour; 0.36 ton of PE/year Visible particulate emissions shall not exceed 0% opacity as a six-minute average Use of water wash or dry filtration system
	OAC rule 3745-31-05(C)	See section A.I.2.a Emissions of OC from primer coating operations shall not exceed 2.45 tons per rolling 12-month period (See A.I.2.b) Emissions of OC from topcoat operations shall not exceed 2.65 tons per rolling 12-month period (See A.I.2.b)

Issued: To be entered upon final issuance

OAC rule 3745-17-11(B)	See section A.I.2.c
OAC rule 3745-17-07(A)	See section A.I.2.c
OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily usage of primer coating never exceeding 10 gallons in any one day and topcoat usage never exceeding 10 gallons in any one day
40 CFR Part 63, Subpart M	See section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(C).

2.b Emissions of OC from primer coating operations shall not exceed 2.45 tons per rolling 12-month period. Emissions of OC from topcoat coating operations shall not exceed 2.65 tons of per rolling 12-month period.

The 2.45 and 2.65 tons of OC per rolling 12-month period are federally enforceable limitations based on coating usage and content restrictions (See A.II.1 and A.II.2) and are being established for purposes of avoiding "Prevention of Significant Deterioration"(PSD) applicability. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The maximum annual coating usage rate for emissions unit K062, shall not exceed the following:

- a. 778 gallons of primer, based upon a rolling, 12-month summation of the monthly primer usage rates.
- b. 783 gallons of topcoat, based upon a rolling, 12-month summation of the monthly topcoat usage rates.

To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating usage rates specified in the following table:

Maximum Allowable
Cumulative Coating Usage Rates

Month	Primer Usage (Gallons)	Topcoat Usage (Gallons)
1	156	157
1 - 2	212	214
1 - 3	268	271
1 - 4	324	328
1 - 5	380	385
1 - 6	436	442
1 - 7	492	499
1 - 8	548	556
1 - 9	604	613
1 - 10	660	670
1 - 11	716	727
1 - 12	778	783

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual primer/topcoat usage limitations shall be based upon a rolling 12-month summation of the coating usage rates.

2. The OC content of coating materials employed in this emissions unit shall not exceed the following:
 - i. 6.30 pounds per gallon of primer, as applied;
 - ii. 6.77 pounds per gallon of topcoat, as applied

3. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K062:
 - a. the name and identification number of each primer and topcoat employed;
 - b. the number of gallons of each primer employed;
 - c. the total number of gallons of all primers employed (summation of A.III.2.b for all primers);
 - d. the number of gallons of each topcoat employed;
 - e. the total number of gallons of all topcoats employed (summation of A.III.2.d for all topcoats);

3. In conjunction with the monitoring and record keeping requirements in section A.III.2 above, the permittee shall collect and record the following information each month for coating material usage in emissions unit K062:
 - a. the name and identification number of each primer and topcoat employed;
 - b. the number of gallons of each primer employed;
 - c. the number of gallons of each topcoat employed;
 - d. the organic compound (OC) content of each coating (primer and topcoat), as applied, in pounds per gallon;
 - e. the OC emission rate for each primer employed ($A.III.3.b \times A.III.3.d$), in pounds;
 - f. the total OC emission rate for all primers employed (summation of A.III.3.e for all primers), in pounds or tons;
 - g. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all primers employed, in tons;
 - h. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all primers employed, in tons.
 - i. for the first 12 months of operation, following the issuance of this permit, the cumulative primer usage rate, in gallons;
 - j. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month primer usage rate, in gallons.

- k. the OC emission rate for each topcoat employed (A.III.3.c x A.III.3.d), in pounds;
 - l. the total OC emission rate for all topcoats employed (summation of A.III.3.k for all topcoats), in pounds or tons;
 - m. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions for all topcoats employed, in tons;
 - n. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates for all topcoats employed, in tons.
 - o. for the first 12 months of operation, following the issuance of this permit, the cumulative topcoat usage rate, in gallons;
 - p. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month topcoat usage rate, in gallons.
4. The permittee shall collect and maintain monthly records of the following information for the cleanup operations:
- a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds per gallon;
 - d. the OC emission rate for each cleanup material employed (A.III.4.b x A.III.4.c), in pounds; and
 - e. the total OC emission rate for all the cleanup materials employed, (summation of A.III.4.d for all cleanup materials), in pounds or tons.
 - f. the annual year to date OC emissions from cleanup operations, in tons per year (summation of A.III.4.e for each calendar month to date from January to December).

IV. Reporting Requirements

- 1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

DTR Industries Inc

PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: K062

- a. All exceedances of the monthly OC emission limitation of 139.5 pounds from cleanup operations;
- b. All exceedances of the rolling, 12-month OC emission limitation of 2.45 tons from primer coating operations;
- c. All exceedances of the rolling, 12-month OC emission limitation of 2.65 tons from topcoat coating operations;
- d. All exceedances of the rolling, 12-month primer coating usage restriction of 778 gallons;
- e. All exceedances of the rolling, 12-month topcoat coating usage restriction of 783 gallons;
- f. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative primer and topcoat coatings usage rates specified in section A.II.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage restrictions for primer and topcoat operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
4. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 6.30 pounds of OC/gallon of primer, as applied and/or the 6.77 pounds of OC/gallon of topcoat, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
5. The permittee shall submit annual reports that summarize the total annual actual OC emissions from the cleanup operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation
63.00 lbs of organic compounds(OC)/day from primer coating operations

Applicable Compliance Method

The daily allowable emission limitation was established by multiplying the daily primer usage restriction of 10 gallons by a maximum OC content restriction of 6.30 pounds/gallon. Therefore provided compliance is shown with the primer usage and content restrictions, compliance with the daily allowable emission limitation will be assumed.

b. Emission Limitation

Emissions of OC from primer coating operations shall not exceed 2.45 tons per rolling 12-month period

Applicable Compliance Method

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.3.h of this permit.

c. Emission Limitation

67.70 pounds of OC/day from topcoat operations

Applicable Compliance Method

The daily allowable emission limitation was established by multiplying the daily topcoat usage restriction of 10 gallons by a maximum OC content restriction of 6.77 pounds/gallon. Therefore provided compliance is shown with the topcoat usage and content restrictions, compliance with the daily allowable emission limitation will be assumed.

d. Emission Limitation

Emissions of OC from topcoat operations shall not exceed 2.65 tons per rolling 12-month period

Applicable Compliance Method

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.3.n of this permit.

e. Emission Limitation

139.5 lbs of OC/month; 0.84 ton of OC/year from the use of cleanup materials

Applicable Compliance Method

Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

f. Emission Limitation

0.08 lb of PE/hour; 0.36 ton of PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 5.

g. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with 40 CFR Part 60 Appendix A, Method 9.

h. Emission Limitation

The OC content of primer coating employed in this emissions unit shall not exceed 6.30 pounds per gallon, as applied

Applicable Compliance Method

Compliance with the OC content restriction above shall be based upon the record keeping requirements specified in section A.III.3.d of this permit.

i. Emission Limitation

The OC content of topcoat coating employed in this emissions unit shall not exceed 6.77 pounds per gallon, as applied

Applicable Compliance Method

Compliance with the OC content restriction above shall be based upon the record keeping requirements specified in section A.III.3.d of this permit.

h. Emission Limitation

The maximum annual primer usage rate shall not exceed 778 gallons, based upon a rolling, 12-month summation of the monthly primer usage rates.

DTR Industries Inc

PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: K062

Applicable Compliance Method

Compliance with the annual allowable primer usage rate shall be based upon the record keeping requirements specified in section A.III.3.j of this permit.

i. Emission Limitation

The maximum annual topcoat usage rate shall not exceed 783 gallons, based upon a rolling, 12-month summation of the monthly topcoat usage rates.

Applicable Compliance Method

Compliance with the annual allowable primer usage rate shall be based upon the record keeping requirements specified in section A.III.3.p of this permit.

j. Emission Limitation

VOC emission exemption, based on maximum daily usage of primer coating never exceeding 10 gallons in any one day and topcoat usage never exceeding 10 gallons in any one day

Applicable Compliance Method

Compliance with the maximum daily coating usage restrictions above shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K062 - automatic adhesive spray machine - miscellaneous metal parts coating operation	See B.III.1	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for emissions units K062, K063, and P074 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 PTI 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 PTI 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 (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 7.13
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1207
 MAGLC (ug/m3): 4476

Pollutant: 2-Butoxyethanol

DTR Industries Inc

PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: K062

TLV (mg/m³): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.69
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 123
MAGLC (ug/m³): 2301.49

Pollutant: Triethylamine
TLV (mg/m³): 4.1
Maximum Hourly Emission Rate (lbs/hr): 0.19
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 33.92
MAGLC (ug/m³): 97.6

Pollutant: Ethylene Glycol
TLV (mg/m³): 93.6
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 87.36
MAGLC (ug/m³): 2229

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 compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. 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 de minimis

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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K063 - automatic water-borne paint spray machine (miscellaneous metal parts coating operation)	OAC rule 3745-31-05(A)(3)	Use of water wash or dry filtration system
		0.88 lb of organic compounds (OC)/hour
		0.17 lb of particulate emissions (PE)/hour; 0.74 ton of PE/year
		Visible particulate emissions shall not exceed 0% opacity as a six-minute average
		Use of water wash or dry filtration system
	OAC rule 3745-31-05(C)	See A.I.2.a
		Emissions of OC shall not exceed 1.20 tons per rolling 12-month period (See A.I.2.c)
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating
	OAC rule 3745-17-07(A)	See A.I.2.b
	OAC rule 3745-17-11(B)	See A.I.2.b

40 CFR Part 63, Subpart M	See section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS
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2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(C).
- 2.b** The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The emissions of OC from emissions unit K063 shall not exceed 1.20 tons per rolling 12-month period based on a coating usage restriction and a coating OC content restriction (See section A.II.1 and A.II.2). The 1.20 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.
- 2.d** The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

- 1. The maximum annual coating usage rate for emissions unit K063, shall not exceed 2,240 gallons, based upon a rolling, 12-month summation of the monthly coating usages.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating usage rates specified in the following table:

Maximum Allowable
Cumulative Coating Usage Rates

Month	Coating Usage (Gallons)
1	448
1 - 2	611
1 - 3	774
1 - 4	937
1 - 5	1100
1 - 6	1263

1 - 7	1426
1 - 8	1589
1 - 9	1752
1 - 10	1915
1 - 11	2078
1 - 12	2240

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating limitations shall be based upon a rolling 12-month summation of the coating usage rates.

2. The OC content of each coating employed in this emissions unit shall not exceed 1.07 lbs per gallon, as applied.
3. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each month for all the coatings employed in emissions units K063:
 - a. the name and identification number of each coating employed;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the total number of gallons of all the coatings employed (summation of A.III.2.d for all coatings);
 - f. the rolling, 12-month coatings usage rates, in gallons;
 - g. the OC emission rate for each coating employed (A.III.2.b x A.III.2.d), in pounds;

- h. the total OC emission rate for all the coatings employed (summation of A.III.2.g for all coatings), in pounds or tons;
- i. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;
- j. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
- k. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
- l. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coatings usage rate, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 1.20 tons.
 - b. All exceedances of the rolling, 12-month coatings usage restriction of 2,240 gallons.
 - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section A.II.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

- 3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings:
 - i. coatings that exceed 3.5 lbs of VOC/gallon minus water and exempt solvents;
 - ii. coatings that exceed 1.07 lbs of OC/gallon, as applied;

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.

V. Testing Requirements

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

a. Emission Limitation: 0.88 lbs OC/hr

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.82 gallons per hour) by the maximum OC content of all the coatings (1.07 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation

Emissions of OC shall not exceed 1.20 tons per rolling 12-month period

Applicable Compliance Method

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.2.j. of this permit.

c. Emission Limitation

0.17 lb of particulate emissions (PE)/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 5.

- d. Emission Limitation
0.74 ton of PE/year

Applicable Compliance Method

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation
Visible particulate emissions shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with 40 CFR Part 60 Appendix A, Method 9.

- f. Emission Limitation
3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.2.c of this permit. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

- g. Emission Limitation
The maximum annual coating usage rate shall not exceed 2,240 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method

Compliance with the annual allowable coating usage rate shall be based upon the record keeping requirements specified in section A.III.3.l of this permit.

- h. Emission Limitation: 1.07 pounds OC per gallon of coating, as applied

Applicable Compliance Method: Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in section A.III.2.b of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the coatings.

DTR Industries Inc

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Facility ID: 0302000166

Emissions Unit ID: K063

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K063 - automatic water-borne paint spray machine (miscellaneous metal parts coating operation)	See B.III.1	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for emissions units K062, K063, and P074 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 PTI 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 PTI 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 (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 7.13
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1207
 MAGLC (ug/m3): 4476

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PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: K063

Pollutant: 2-Butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.69
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 123
MAGLC (ug/m3): 2301.49

Pollutant: Triethylamine
TLV (mg/m3): 4.1
Maximum Hourly Emission Rate (lbs/hr): 0.19
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 33.92
MAGLC (ug/m3): 97.6

Pollutant: Ethylene Glycol
TLV (mg/m3): 93.6
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 87.36
MAGLC (ug/m3): 2229

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 compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. 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 de minimis 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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P074 - Glycol Dip Tank with Steam Cleaning Operation (Submerged Assembling Machine)	OAC rule 3745-31-05(A)(3)	1.73 lbs of organic compounds (OC)/hour
	OAC rule 3745-31-05(C)	Emissions of OC shall not exceed 2.50 tons per rolling 12-month period (See A.I.2.a)
	OAC rule 3745-21-07(G)	None (See A.II.1)

2. Additional Terms and Conditions

- 2.a The emissions of OC from emissions unit P074 shall not exceed 2.50 tons per rolling 12-month period based on a production restriction (See section A.II.1). The 2.50 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.
- 2.b The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, is prohibited in this emissions unit.
2. The maximum annual production of liquid-filled engine mounts for emissions unit P074 shall not exceed 694,444 units per year, based upon a rolling 12-month summation of the production rates for this emissions units.

DTR Industries Inc**PTI Application: 03-17069****Issued: To be entered upon final issuance****Facility ID: 0302000166**

Emissions Unit ID: P074

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the production rates specified in the following table:

Maximum Allowable
Cumulative Production Rates

Month	Number of Units Produced
1	138,888
1 - 2	189,393
1 - 3	239,898
1 - 4	290,403
1 - 5	340,908
1 - 6	391,413
1 - 7	441,918
1 - 8	492,423
1 - 9	542,928
1 - 10	593,433
1 - 11	643,938
1 - 12	694,444

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual OC emission limitation shall be based upon a rolling 12-month summation of the production rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit P074:

- a. the total production rate, number of units produced;
- b. the calculated OC emissions, in lbs or tons, using the following equation:

$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound of OC/unit produced})$$

- c. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total OC emissions, in tons;

- d. beginning the first month, after the first 12 months of operation following the issuance of this permit, the rolling, 12-month OC emission rates, in tons.
 - e. for the first 12 months of operation, following the issuance of this permit, the cumulative production rate, in number of units produced; and
 - f. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month production rate, in number of units produced.
2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month OC emission limitation of 1.73 tons.
 - b. All exceedances of the rolling, 12-month production restriction of 694,444 number of units produced gallons.
 - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production rates specified in section A.II.2.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
1.73 lbs of OC/hour

DTR Industries Inc

PTI Application: 03-17069

Issued: To be entered upon final issuance

Facility ID: 0302000166

Emissions Unit ID: P074

Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying a maximum production rate of 240 units/hour and an emission factor of 0.0072 lb of OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation

Emissions of OC shall not exceed 2.50 tons per rolling 12-month period

Applicable Compliance Method

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.2.d of this permit.

c. Emission Limitation

The maximum annual production rate shall not exceed 694,444 number of units produced, based upon a rolling, 12-month summation of the monthly production rates.

Applicable Compliance Method

Compliance with the annual allowable production rate shall be based upon the record keeping requirements specified in section A.III.3.f of this permit.

VI. Miscellaneous Requirements

None

DTR Industries Inc
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Issued: To be entered upon final issuance

Facility ID: 0302000166
Emissions Unit ID: P074

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P074 - Glycol Dip Tank with Steam Cleaning Operation (Submerged Assembling Machine)	See B.III.1	See B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for emissions units K062, K063, and P074 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 PTI 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 PTI 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 (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 7.13
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1207
 MAGLC (ug/m3): 4476

Pollutant: 2-Butoxyethanol

DTR Industries Inc

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Facility ID: 0302000166

Emissions Unit ID: P074

TLV (mg/m³): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.69
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 123
MAGLC (ug/m³): 2301.49

Pollutant: Triethylamine
TLV (mg/m³): 4.1
Maximum Hourly Emission Rate (lbs/hr): 0.19
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 33.92
MAGLC (ug/m³): 97.6

Pollutant: Ethylene Glycol
TLV (mg/m³): 93.6
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 87.36
MAGLC (ug/m³): 2229

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 compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. 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 de minimis

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 evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None