

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

Permit To Install **05-13889**

A. Source Description

The Belletech Corporation (Belletech) manufactures side, rear and roof glass assemblies for the automobile industry. For their process, Belletech employs adhesives, primers (coatings) and cleanup materials.

Belletech requested federally enforceable restrictions for their VOC and HAP emissions to ensure "synthetic minor" status.

B. Facility Emissions and Attainment Status

The facility-wide potential emissions from Belletech are 61.0 tons for VOC, 22.0 tons for a single HAP (MEK) and less than 38.0 tons for combined HAPs. Actual facility-wide emissions are less than potential emissions, and are significantly less than the major source thresholds for VOC and HAP.

Belletech is located in Logan County. Logan County is designated attainment for all criteria pollutants.

C. Source Emissions

The air contaminant sources affected by this permit are all the current, non-exempt sources located at Belletech. The combined annual VOC emission limitation for this permit is 21.3 tons. The facility-wide, single HAP limitation is 9.9 tons, and the combined, facility-wide HAPs limitation is 24.9 tons.

D. Conclusion

This permit effectively limits VOC emissions from the identified air contaminant sources. As a result, this permit effectively limits facility-wide potential VOC emissions to less than 23 tons per year. In addition, this permit effectively limits the annual, facility-wide potential emissions of any single HAP to 9.9 tons and combined HAPs to 24.9 tons.

VOC emissions are limited by VOC content restrictions, annual material usage restrictions, and annual VOC emission limitations. To ensure compliance with the material and VOC emission limitations, the permittee is required to maintain monthly records and rolling, 12-month summation records of material usage and VOC emissions.

HAP emissions are limited by facility-wide HAP usage restrictions. To ensure compliance with the HAP usage limitations, the permittee is required to maintain monthly records of the single and combined HAP usage for the entire facility, as well as rolling, 12-month HAP usage summations.

As a result of material usage restrictions and VOC emission limitations, the facility-wide VOC and HAP emissions from Belletech Corporation are limited below major source thresholds. In addition, the limitations are federally-enforceable, thereby effectively making Belletech a "synthetic minor" facility.



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

LOGAN COUNTY

Application No: 05-13889

Fac ID: 0546010102

DATE: 6/7/2005

Belletech Corporation
Eric Tanner
700 West Lake Avenue
Bellefontaine, OH 43311-9647

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	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 **\$2000** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SWDO

IN

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-13889** FOR AN AIR CONTAMINANT SOURCE FOR
Belletech Corporation

On 6/7/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Belletech Corporation**, located at **700 West Lake Avenue, Bellefontaine, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-13889:

Modification of several process units to combine material usage and limitations.

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.

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911 [(937)285-6357]



**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 05-13889

Application Number: 05-13889
Facility ID: 0546010102
Permit Fee: **To be entered upon final issuance**
Name of Facility: Belletech Corporation
Person to Contact: Eric Tanner
Address: 700 West Lake Avenue
Bellefontaine, OH 43311-9647

Location of proposed air contaminant source(s) [emissions unit(s)]:
**700 West Lake Avenue
Bellefontaine, Ohio**

Description of proposed emissions unit(s):
Modification of several process units to combine material usage and limitations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

Page 5 of 59

Belletech Corporation

PTI Application: 05-13889

Issued: To be entered upon final issuance

Facility ID: 0546010102

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	21.3
single HAP	9.9
combined HAPs	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - Adhesive dispensing station no. 1 (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.55 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 0.274 pounds per gallon of adhesive and 7.3 pounds per gallon of cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (1 mmBtu/hr) :</p> <p>0.002 lb PE(filterable)/hr 0.0006 lb SO₂/hr 0.10 lbs NO_x/hr 0.08 lbs CO/hr 0.005 lb VOC/hr</p>
	OAC rule 3745-31-05(C)	See A.I.2.a, below.
	OAC rule 3745-21-07(G)(2)	VOC emissions shall not exceed 1.76 tons per rolling, 12-month summation with cleanup materials.
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.2.b, below.
	OAC rule 3745-18-06(E)	See A.I.2.c, below.
		See A.I.2.d, below.

OAC rule 3745-17-10(B)

The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the fuel burning equipment associated with this emissions unit).

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

2. Additional Terms and Conditions

2.a The VOC emission limit of 0.55 lbs per hour, and the hourly emission limits from natural gas combustion are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

2.c The liquid organic materials or substances containing liquid organic material used in this emissions unit are not baked, heat-cured, or heat-polymerized, and do not come into contact with flame. As such, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(1). Furthermore, the adhesives employed in this emissions unit shall not contain photochemically reactive material (per the definition in OAC rule 3745-21-01(C)(5)). Therefore, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(2).

2.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in this permit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State

Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The maximum annual adhesive usage for this emissions unit shall not exceed 6,475 gallons, based upon a rolling, 12-month summation of the adhesive usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 240 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each adhesive and cleanup material employed;
 - b. Documentation whether or not each adhesive and cleanup material employed is "Photochemically Reactive Material" as defined in OAC rule 3745-21-01(C)(5);
 - c. The VOC content of each adhesive and cleanup material employed, in pounds per gallon;
 - d. The volume, in gallons, of each adhesive and cleanup material employed;
 - e. The rolling, 12-month summation of the volume, in gallons, of all adhesives employed;
 - f. The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;
 - g. The total VOC emissions from all the adhesives and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each coating and cleanup material employed during the month];
 - h. The combined rolling 12-month summation of VOC emissions from the adhesives and cleanup materials employed in this emissions unit, in tons.

2. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each HAP-containing material (including adhesives, coatings and cleanup materials) employed;
 - b. the individual Hazardous Air Pollutant (HAP)* content for each HAP of each HAP-containing material* in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating material in pounds of combined HAPs per gallon of material coating, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each HAP-containing material* employed;
 - e. the total individual HAP usage for each HAP from all HAP-containing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - f. the total combined HAP usage from all HAP-containing material, in pounds or tons per month [the sum of (c) times (d) for each material];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month adhesive usage limitation of 6,475 gallons;
 - b. the rolling, 12-month cleanup material usage limitation of 240 gallons;
 - c. the rolling, 12-month VOC emission limitation of 1.76 tons;

- d. the rolling, 12-month individual HAP emission limitation of 9.9 tons; and
- e. the rolling, 12-month combined HAP emissions limitation of 24.9 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying adhesives and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.
- 3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

E. Testing Requirements

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

- 1. Emission Limitation:

0.55 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$Er = (Au) * (VOCa) + (Cu) * (VOCc)$$

where,

Er = the hourly VOC emission rate, lbs/hr

Au = maximum hourly adhesive usage rate of 2 gallons

VOCa = the maximum VOC content of the adhesive, 0.274 lbs/gallon

Cu = the maximum hourly catalyst usage rate of 0.03 gallons

VOCc = the maximum VOC content for the catalyst, 0 lbs/gallon

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation needs shall be based upon a mass balance equation.

- 2. Emission Limitations:

Belletech Corporation

PTI Application: 05-13889

Issued: To be entered upon final issuance

Facility ID: 0546010102

Emissions Unit ID: K007

0.274 lbs VOC/gal of adhesive and 7.3 lbs VOC/gal of cleanup materials

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitations:

0.002 lb PE(filterable)/hr
0.0006 lb SO₂/hr
0.10 lbs NO_x/hr
0.08 lbs CO/hr
0.005 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (980.4 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM₁₀, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4, 201 and 202; and for SO₂, Methods 1 - 4 and 6.

*** All PE is assumed to be PM₁₀

4. Emission Limitation:

1.76 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

5. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Methylene bisphenyl isocyanate (MDI)

TLV (mg/m³): 0.05

Maximum Hourly Emission Rate: 0.0035 lb/hr and 0.000442 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.0009

MAGLC (mg/m³): 0.005

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/sec

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.1662

MAGLC (mg/m³): 18.8

2. 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 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; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Adhesive dispensing (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.9 pounds per hour.</p> <p>VOC content shall not exceed 0.274 pounds per gallon of adhesive and 7.3 pounds per gallon of cleanup materials.</p>
	OAC rule 3745-31-05(C)	<p>See A.2.a, below</p> <p>VOC emissions shall not exceed 4.16 tons per rolling, 12-month summation with cleanup materials.</p>
	OAC rule 3745-21-09(U)	<p>See A.2.b, below.</p> <p>The VOC content limitation specified per this rule is less stringent than the limit established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limit of 1.9 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single

HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual adhesive usage for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the adhesive usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

2. The maximum annual cleanup material usage for this emissions unit shall not exceed 240 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each adhesive and cleanup material employed;
 - b. The VOC content of each adhesive and cleanup material employed, in pounds per gallon;
 - c. The volume, in gallons, of each adhesive and cleanup material employed;
 - e. The rolling, 12-month summation of the volume, in gallons, of all adhesive employed;
 - f. The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;

- g. The total VOC emissions from all the adhesives and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each adhesive and cleanup material employed during the month];
- h. The combined rolling 12-month summation of VOC emissions from the adhesives and cleanup materials employed in this emissions unit, in tons.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month adhesive usage limitation of 24,000 gallons;
 - b. the rolling, 12-month cleanup material usage limitation of 240 gallons; and
 - c. the rolling, 12-month VOC emission limitation of 4.16 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying adhesive and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

- 1. Emission Limitation:

1.9 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E_r = (A) * (VOC_a) + (C) * (VOC_c)$$

where,

E_r = the hourly VOC emission rate, lbs/hr

A = maximum hourly adhesive usage rate of 7 gallons

VOC_a = the maximum VOC content of the adhesive, 0.274 lbs/gallon

C = the maximum hourly catalyst usage rate of 0.03 gallons

VOC_c = the maximum VOC content for the catalyst, 0 lbs/gallon

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation needs shall be based upon a mass balance equation.

2. Emission Limitations:

0.274 lbs VOC/gal of adhesive and 7.3 lbs VOC/gal of cleanup materials

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

4.16 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Methylene bisphenyl isocyanate (MDI)

TLV (mg/m³): 0.05

Maximum Hourly Emission Rate: 0.005 lb/hr or 0.00065 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.001
MAGLC (mg/m³): 0.005

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate (lbs/hr): 0.34 lb/hr and 0.043 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.101

MAGLC (mg/m³): 18.8

2. 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 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; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

Belletech Corporation

PTI Application: 05-13889

Issued: To be entered upon final issuance

Facility ID: 0546010102

Emissions Unit ID: K011

- 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.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Automatic holder station (Terms in this permit supersede those identified in PTI 05-5657 issued on 09/18/92.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.68 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 4.90 pounds per gallon of coating and 6.71 pounds per gallon of cleanup materials.</p>
	OAC rule 3745-31-05(C)	See A.I.2.a, below.
	OAC rule 3745-21-07(G)	<p>VOC emissions shall not exceed 1.76 tons per rolling, 12-month summation with cleanup materials.</p> <p>See A.2.b, below.</p> <p>See A.I.2.c, below.</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limit of 3.68 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

- 2.c** The liquid organic materials or substances containing liquid organic material used in this emissions unit are not baked, heat-cured, or heat-polymerized, and do not come into contact with flame. As such, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(1). Furthermore, the materials employed in this emissions unit shall not contain photochemically reactive material (per the definition in OAC rule 3745-21-01(C)(5)). Therefore, this emissions unit is not subject to the requirements of OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

- 1. The maximum annual coating usage for this emissions unit shall not exceed 1,248 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

- 2. The maximum annual cleanup material usage for this emissions unit shall not exceed 390 gallons, based upon a rolling, 12-month summation of the cleanup material usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each coating and cleanup material employed;
 - b. Documentation whether or not each coating and cleanup material employed is "Photochemically Reactive Material" as defined in OAC rule 3745-21-01(C)(5);
 - c. The VOC content of each coating and cleanup material employed, in pounds per gallon;
 - d. The volume, in gallons, of each coating and cleanup material employed;

- e. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
- f. The rolling, 12-month summation of the volume, in gallons, of all the cleanup material employed;
- g. The total VOC emissions from all the coatings and cleanup materials employed, in pounds [summation of the VOC content multiplied by the usage for each coating and cleanup material employed during the month];
- h. The combined rolling 12-month summation of VOC emissions from the coatings and cleanup materials employed in this emissions unit, in tons.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation of 1,248 gallons;
 - b. the rolling, 12-month cleanup material usage limitation of 390 gallons;
 - c. the rolling, 12-month VOC emission limitation of 4.37 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings and cleanup materials, i.e., exceeding the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.
- 3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

E. Testing Requirements

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

- 1. Emission Limitation:

3.68 lbs VOC/hr

Belletech Corporation

PTI Application: 05-13889

Issued: To be entered upon final issuance

Facility ID: 0546010102

Emissions Unit ID: R001

Applicable Compliance Method:

The hourly VOC emission limitation was established by multiplying the maximum hourly coating usage of 0.75 gallons by the maximum VOC content of the coating, 4.9 lbs/gal. Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

2. Emission Limitations:

4.9 lbs VOC/gal of coating and 6.71 lbs VOC/gal of cleanup materials

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

4.37 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Methylene bisphenyl isocyanate (MDI)

TLV (mg/m³): 0.05

Maximum Hourly Emission Rate: 0.0045 lb/hr or 0.00057 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.0012

MAGLC (mg/m³): 0.005

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate: 0.61 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.1662

MAGLC (mg/m³): 59.0

2. 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 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; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

Belletech Corporation

PTI Application: 05-13889

Issued: To be entered upon final issuance

Facility ID: 0546010102

Emissions Unit ID: R001

- 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.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Prime glass station (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 2.13 tons per rolling, 12-month summation with cleanup materials.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 615 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed in this emissions unit, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation of 615 gallons;
 - b. the rolling, 12-month VOC emission limitation of 2.13 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.04 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.15 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

2.13 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate: 0.34 lb/hr or 0.0433 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.101

MAGLC (mg/m³): 18.8

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R005 - Holder primer (Terms in this permit supersede those identified in PTI 05-5959 issued on 07/14/93.)	OAC rule 3745-31-05(A)	<p>Volatile organic compound emissions shall not exceed 1.2 pounds per hour.</p> <p>The VOC content limit established by this rule is equivalent to the limit specified by OAC rule 3745-21-09(U)(1)(g).</p> <p>See A.2.a, below</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 1.72 tons per rolling, 12-month summation with cleanup materials.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-09(U)(1)(g)	<p>VOC content shall not exceed 4.9 pounds per gallon, excluding water and exempt solvents, for glass adhesion body primer coating.</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limit of 1.2 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 702 gallons, minus water and exempt solvents, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon, minus water and exempt solvents;
 - c. The volume, in gallons, of each coating material employed, minus water and exempt solvents;
 - e. The rolling, 12-month summation of the volume, in gallons, of all coatings employed, minus water and exempt solvents;
 - f. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - h. The combined rolling 12-month summation of VOC emissions from coatings employed in this emissions unit, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:

- a. the rolling, 12-month coating limitation of 702 gallons, minus water and exempt solvents;
- b. the rolling, 12-month VOC emission limitation of 1.72 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coating, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

1. Emission Limitation:

1.2 lbs VOC/hr

Applicable Compliance Method:

The hourly VOC emission limitation was established by multiplying the maximum hourly coating usage of 0.25 gallons by the maximum VOC content of 4.9 pounds per gallon, minus water and exempt solvents. Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

2. Emission Limitations:

4.9 lbs VOC/gal of coating, minus water and exempt solvents

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

1.72 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Methylene bisphenyl isocyanate (MDI)

TLV (mg/m³): 0.05

Maximum Hourly Emission Rate: 0.019 lb/hr or 0.0025 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.0007

MAGLC (mg/m³): 0.005

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate: 0.34 lb/hr or 0.0433 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.101

MAGLC (mg/m³): 59.0

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R009 - Prime glass station no. 1 (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;

- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

- 1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.11 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

- 2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate: 0.6 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.166

MAGLC (mg/m³): 18.8

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R010 - Prime glass station no. 2 (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;

- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

- 1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.11 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

- 2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate: 0.6 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.166

MAGLC (mg/m3): 18.8

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R011 - Prime glass station no. 3 (Terms in this permit supesede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;

- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

- 1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.11 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

- 2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Toluene

TLV (mg/m³): 188.0

Maximum Hourly Emission Rate: 0.6 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.166

MAGLC (mg/m³): 18.8

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R012 - Prime glass station no. 4 (Terms in this permit supersede those identified in PTI 05-1947 issued on 10/22/86.)	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 7.64 tons per rolling, 12-month summation for emissions units R009, R010, R011, and R012, combined.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for emissions units R009, R010, R011 and R012, combined, shall not exceed 2,200 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R009, R010, R011 and R012, combined:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation for emissions units R009, R010, R011 and R012, combined, of 2,200 gallons;

- b. the rolling, 12-month VOC emission limitation for emissions units R009, R010, R011 and R012, combined, of 7.64 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding the VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

- 1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.06 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.11 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

- 2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

7.64 tons VOC per rolling, 12-month summation for emissions units R009, R010, R011 and R012, combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate: 0.6 lb/hr or 0.077 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.166

MAGLC (mg/m3): 18.8

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R014 - Side window priming station	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.0 pounds per hour and 24.0 pounds per day.</p> <p>VOC content shall not exceed 6.94 pounds per gallon of coating.</p> <p>See A.I.2.a, below.</p>
	OAC rule 3745-31-05(C)	<p>VOC emissions shall not exceed 2.13 tons per rolling, 12-month summation with cleanup materials.</p> <p>See A.2.b, below.</p>
	OAC rule 3745-21-07(G)(2)	<p>The VOC emission limitations specified by this rule are less stringent than the limits established per OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The VOC emission limits of 1.0 lb/hr and 24.0 lbs/day are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY* for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

- * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

The monitoring, record keeping and reporting requirements to ensure compliance with the HAP emission limitations above are contained in the Part II - Terms and Conditions for emissions unit K007 of this permit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 615 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has sufficient existing records to demonstrate compliance with this usage limit upon issuance of this permit. Therefore, no additional usage limits are necessary to ensure compliance for the first 12 months of operation following the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records for this emissions unit of the following information:
 - a. The name and identification number of each coating employed;
 - b. The VOC content of each coating employed, in pounds per gallon;
 - c. The volume, in gallons, of each coating employed;
 - d. The rolling, 12-month summation of the volume, in gallons, of all coatings employed;
 - e. The total VOC emissions from all the coatings employed, in pounds [summation of the VOC content multiplied by the usage for each coating employed during the month];
 - f. The combined rolling 12-month summation of VOC emissions from the coatings employed in this emissions unit, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the following:
 - a. the rolling, 12-month coating usage limitation of 615 gallons;
 - b. the rolling, 12-month VOC emission limitation of 2.13 tons;

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing the use of noncomplying coatings, i.e., exceeding VOC content limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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

1. Emission Limitation:

1.0 lbs VOC/hr and 24.0 lbs VOC/day

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

$$E = P1 * VOC1 + P2 * VOC2$$

where,

E = the hourly VOC emission rate

P1 = the maximum hourly usage of primer no. 1, 0.04 gal

VOC1 = the maximum VOC content of primer no. 1, 6.94 lbs/gal

P2 = the maximum hourly usage of primer no. 2, 0.15 gal

VOC2 = the maximum VOC content of primer no. 2, 4.82 lbs/gal

Compliance is based upon a mass balance of the maximum VOC used per hour for this emissions unit. If operational parameters such as materials and usage rates should change, then compliance with this limitation shall be based upon a mass balance equation.

The daily VOC content limitation is based upon a maximum hourly emission rate of one-pound multiplied by 24 hours per day.

2. Emission Limitations:

6.94 lbs VOC/gal of coating

Applicable Compliance Method:

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials. The record keeping requirements contained in Section C.1 shall demonstrate the materials used complies with these VOC content limitations.

3. Emission Limitation:

2.13 tons VOC per rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section C.1.

4. Compliance with the facility-wide HAP emission limitations in Section A.2.b shall be determined by the record keeping in Section A.2 for emissions unit K007 of this permit.

F. Miscellaneous Requirements

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

Pollutant: Methyl ethyl ketone

TLV (mg/m³): 590.0

Maximum Hourly Emission Rate: 1.022 lb/hr or 0.129 g/s

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m³): 0.141

MAGLC (mg/m³): 59.0

2. 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 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; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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.

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