



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: FINAL PERMIT TO INSTALL MODIFICATION

CERTIFIED MAIL

DARKE COUNTY

Application No: 08-04375

Fac ID: 0819070215

DATE: 9/30/2004

Jafe Decorating Co Inc
Dave Irwin
P.O. Box 359
Greenville, OH 45331-0359

| | |
|--|------------------------------|
| | TOXIC REVIEW |
| | PSD |
| | SYNTHETIC MINOR |
| | CEMS |
| | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |
| | GASOLINE DISPENSING FACILITY |

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

RAPCA



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04375

Application Number: 08-04375
Facility ID: 0819070215
Permit Fee: **\$0**
Name of Facility: Jafe Decorating Co Inc
Person to Contact: Dave Irwin
Address: P.O. Box 359
Greenville, OH 45331-0359

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1250 Martin
Greenville, Ohio**

Description of proposed emissions unit(s):
Correct errors.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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.

Jafe Decorating Co Inc**PTI Application: 08-04375****Modification Issued: 9/30/2004****Facility ID: 0819070215****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> |
|------------------|----------------------|
| Particulate | 28.03 |
| OC | 33.35 |
| CO | 36.8 |
| SO ₂ | 33.6 |

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> |
|--|--------------------------------------|--|
| P006 - Curing oven with cooling chamber (**Modification) | OAC rule 3745-31-05(A)(3) | Organic compound (OC) emissions from this emissions unit shall not exceed 3 lbs/hr, 15 lbs/day and 2.74 tons per year (TPY). |
| | OAC rule 3745-21-07(G)(1) | The OC limit specified by this rule is equivalent to that specified by OAC rule 3745-31-05. |

2. **Additional Terms and Conditions**

- 2.a None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (K006), the permittee shall utilize a value of 80% as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 20% of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This “split” of OC emissions between this emissions unit and the associated spray booth is based upon average coating operation data.
2. The permittee shall collect and record the following information for each day for the oven:
 - a. the total potential (prior to applying the booth/oven “split”) uncontrolled daily OC emission rate for all coatings employed in the coating operation associated with this emissions unit, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in Section C.1 of this permit), in pounds per day;

- b. the total number of hours this emissions unit was in operation (this number should be the same as the number of hours the associated coating operation was in operation); and
 - c. the average hourly OC emission rate, i.e., (a)/(b), in pounds per hour (average).
3. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV (mg/m3): 1.59

Maximum Hourly Emission Rate (lbs/hr): 0.003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.112

MAGLC (ug/m3): 15.0

Pollutant: Toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 65.84

MAGLC (ug/m3): 1884.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation:
3 lbs/hr OC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- b. Emission Limitation:
15 lbs/day OC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements specified in Section C.2.

- c. Emission Limitation:
2.74 TPY OC

Applicable Compliance Method:

Compliance shall be determined by summing the daily emissions, in pounds as specified in Section C 2., for the calendar year and dividing this sum by 2000 lbs/ton.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-4061, issued September 22, 1999.

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> |
|--|--------------------------------------|--|
| P003 - Bell furnace #3 for ion exchange process (**Modification) | OAC rule 3745-31-05(A)(3) | Sulfur dioxide (SO ₂) emissions shall not exceed 6.0 lbs/batch cycle and 8.4 TPY. Particulate emissions (PE) shall not exceed 5.0 lbs/batch cycle and 7.0 TPY. Visible emissions shall not exceed 5%, as a six-minute average. |
| | OAC rule 3745-18-06 | The sulfur dioxide limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-11 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-07 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |

2. Additional Terms and Conditions

- 2.a The 5.0 lbs PM per batch cycle and 6.0 lbs SO₂ per batch cycle limits were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The annual sulfur dioxide usage for this emissions unit shall not exceed 8.4 tons.
2. The annual cuprous chloride usage for this emissions unit shall not exceed 7.0 tons.
3. The annual number of batches for this emissions unit shall not exceed 2,800.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain annual records of the combined sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
2. The permittee shall maintain annual records of the combined cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
3. The permittee shall maintain annual records of the number of batches processed in this emissions unit.
4. The permittee shall maintain annual records of the combined number of batches processed for emissions units P001, P002, P003 and P005.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
 - a. The total, combined annual sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
 - b. The total, combined annual cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
 - c. The total annual number of batches processed for this emissions unit.
 - d. The total, combined annual number of batches processed for emissions units P001, P002, P003 and P005.
 - e. The total annual PE for this emissions unit, in tons.
 - f. The total annual SO₂ emissions for this emissions unit, in tons.

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

E. Testing Requirements

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

a. Emission Limitations-
6.0 lbs SO₂ per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum sulfur dioxide usage rate and the conservative assumption that all of the sulfur dioxide is lost to the atmosphere.

b. Emission Limitations-
5.0 lbs Particulate per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum cuprous chloride usage rate and the conservative assumption that all of the cuprous chloride is lost to the atmosphere as PE.

c. Emission Limitations-
8.4 TPY SO₂

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined sulfur dioxide usage, as specified in Section C.1, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

d. Emission Limitations-
7.0 TPY Particulate

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined cuprous chloride usage, as specified in Section C.2, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

e. Emission Limitations-
5% opacity visible emission limitation, as a six minute average.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: P003

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999. The emissions units P003 was previously allowed 4.2 TPY SO₂. The new allowable emissions limitation is 8.4 TPY SO₂ and this represents a net increase in SO₂ emissions of 4.2 TPY from emission unit P003.

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> |
|--|--|--|
| P004 - Chemical Reduction Unit - electrically heated bell furnace #4 and #5, with two reducing gas generators (**Modification) | OAC rule 3745-31-05(A)(3) OAC rule 3745-21-08 | Carbon monoxide (CO) emissions shall not exceed 8.40 lbs/hr and 36.8 TPY. The CO limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |

2. **Additional Terms and Conditions**

- 2.a The 8.40 lbs/hr CO limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The annual natural gas usage for this emissions unit shall not exceed 3,520,000 cubic feet.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the natural gas usage in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The annual natural gas usage.
 - b. The total CO emissions, in tons.

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

E. Testing Requirements

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

- a. Emission Limitation-
8.4 lbs/hr CO

Applicable Compliance Method-

This emission limitation is based upon the maximum hourly natural gas usage and the partial combustion equation supplied by the facility in the application for this emissions unit.

This generator reacts natural gas with oxygen under oxygen deficient conditions to generate a gas that is rich in H₂ and CO. If the amount of gas combusted remains at the permitted level then the CO product will be within the set allowable.

- b. Emission Limitation-
36.8 TPY CO

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly emission rate of 8.4 lbs/hr by the maximum operation schedule of 8760 hrs/yr and converting to tons by dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999.

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> |
|--|--------------------------------------|--|
| P005 - Bell furnace #6 for ion exchange process (**Modification) | OAC rule 3745-31-05(A)(3) | Sulfur dioxide (SO ₂) emissions shall not exceed 6.0 lbs/batch cycle and 8.4 TPY. Particulate emissions (PE) shall not exceed 5.0 lbs/batch cycle and 7.0 TPY. Visible emissions shall not exceed 5%, as a six-minute average. |
| | OAC rule 3745-18-06 | The sulfur dioxide limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-11 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-07 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |

2. Additional Terms and Conditions

- 2.a The 5.0 lbs PM per batch cycle and 6.0 lbs SO₂ per batch cycle limits were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The annual sulfur dioxide usage for this emissions unit shall not exceed 8.4 tons.
2. The annual cuprous chloride usage for this emissions unit shall not exceed 7.0 tons.
3. The annual number of batches for this emissions unit shall not exceed 2,800.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain annual records of the combined sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
2. The permittee shall maintain annual records of the combined cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
3. The permittee shall maintain annual records of the number of batches processed in this emissions unit.
4. The permittee shall maintain annual records of the combined number of batches processed for emissions units P001, P002, P003 and P005.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
 - a. The total, combined annual sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
 - b. The total, combined annual cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
 - c. The total annual number of batches processed for this emissions unit.
 - d. The total, combined annual number of batches processed for emissions units P001, P002, P003 and P005.
 - e. The total annual PE for this emissions unit, in tons.
 - f. The total annual SO₂ emissions for this emissions unit, in tons.

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

E. Testing Requirements

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

a. Emission Limitations-
6.0 lbs SO₂ per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum sulfur dioxide usage rate and the conservative assumption that all of the sulfur dioxide is lost to the atmosphere.

b. Emission Limitations-
5.0 lbs Particulate per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum cuprous chloride usage rate and the conservative assumption that all of the cuprous chloride is lost to the atmosphere as PE.

c. Emission Limitations-
8.4 TPY SO₂

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined sulfur dioxide usage, as specified in Section C.1, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

d. Emission Limitations-
7.0 TPY Particulate

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined cuprous chloride usage, as specified in Section C.2, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

e. Emission Limitations-
5% opacity visible emission limitation, as a six minute average.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: P005

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-4061, issued September 22, 1999. The emissions units P005 was previously allowed 4.2 TPY SO₂. The new allowable emissions limitation is 8.4 TPY SO₂ and this represents a net increase in SO₂ emissions of 4.2 TPY from emission unit P005.

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> |
|--|--------------------------------------|---|
| P001 - Bell furnace #1 for ion exchange process (**Modification) | OAC rule 3745-31-05(A)(3) | Sulfur dioxide (SO ₂) emissions shall not exceed 6.0 lbs/batch cycle and 8.4 TPY. |
| | | Particulate emissions (PE) shall not exceed 5.0 lbs/batch cycle and 7.0 TPY. |
| | | Visible emissions shall not exceed 5%, as a six-minute average. |
| | OAC rule 3745-18-06 | The sulfur dioxide limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-11 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-07 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |

2. Additional Terms and Conditions

- 2.a The 5.0 lbs PM per batch cycle and 6.0 lbs SO₂ per batch cycle limits were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The annual sulfur dioxide usage for this emissions unit shall not exceed 8.4 tons.
2. The annual cuprous chloride usage for this emissions unit shall not exceed 7.0 tons.
3. The annual number of batches for this emissions unit shall not exceed 2,800.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain annual records of the combined sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
2. The permittee shall maintain annual records of the combined cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
3. The permittee shall maintain annual records of the number of batches processed in this emissions unit.
4. The permittee shall maintain annual records of the combined number of batches processed for emissions units P001, P002, P003 and P005.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
 - a. The total, combined annual sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
 - b. The total, combined annual cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
 - c. The total annual number of batches processed for this emissions unit.
 - d. The total, combined annual number of batches processed for emissions units P001, P002, P003 and P005.
 - e. The total annual PE for this emissions unit, in tons.
 - f. The total annual SO₂ emissions for this emissions unit, in tons.

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

E. Testing Requirements

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

a. Emission Limitations-
6.0 lbs SO₂ per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum sulfur dioxide usage rate and the conservative assumption that all of the sulfur dioxide is lost to the atmosphere.

b. Emission Limitations-
5.0 lbs Particulate per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum cuprous chloride usage rate and the conservative assumption that all of the cuprous chloride is lost to the atmosphere as PE.

c. Emission Limitations-
8.4 TPY SO₂

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined sulfur dioxide usage, as specified in Section C.1, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

d. Emission Limitations-
7.0 TPY Particulate

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined cuprous chloride usage, as specified in Section C.2, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

e. Emission Limitations-
5% opacity visible emission limitation, as a six minute average.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: P001

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999. The emissions units P001 was previously allowed 4.2 TPY SO₂. The new allowable emissions limitation is 8.4 TPY SO₂ and this represents a net increase in SO₂ emissions of 4.2 TPY from emission unit P001.

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> |
|--|--------------------------------------|--|
| P002 - Bell furnace #2 for ion exchange process (**Modification) | OAC rule 3745-31-05(A)(3) | Sulfur dioxide (SO ₂) emissions shall not exceed 6.0 lbs/batch cycle and 8.4 TPY. Particulate emissions (PE) shall not exceed 5.0 lbs/batch cycle and 7.0 TPY. Visible emissions shall not exceed 5%, as a six-minute average. |
| | OAC rule 3745-18-06 | The sulfur dioxide limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-11 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |
| | OAC rule 3745-17-07 | The particulate limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05. |

2. Additional Terms and Conditions

- 2.a The 5.0 lbs PM per batch cycle and 6.0 lbs SO₂ per batch cycle limits were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The annual sulfur dioxide usage for this emissions unit shall not exceed 8.4 tons.
2. The annual cuprous chloride usage for this emissions unit shall not exceed 7.0 tons.
3. The annual number of batches for this emissions unit shall not exceed 2,800.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain annual records of the combined sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
2. The permittee shall maintain annual records of the combined cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
3. The permittee shall maintain annual records of the number of batches processed in this emissions unit.
4. The permittee shall maintain annual records of the combined number of batches processed for emissions units P001, P002, P003 and P005.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify:
 - a. The total, combined annual sulfur dioxide usage for emissions units P001, P002, P003 and P005, in tons.
 - b. The total, combined annual cuprous chloride usage for emissions units P001, P002, P003 and P005, in tons.
 - c. The total annual number of batches processed for this emissions unit.
 - d. The total, combined annual number of batches processed for emissions units P001, P002, P003 and P005.
 - e. The total annual PE for this emissions unit, in tons.
 - f. The total annual SO₂ emissions for this emissions unit, in tons.

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

E. Testing Requirements

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

a. Emission Limitations-
6.0 lbs SO₂ per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum sulfur dioxide usage rate and the conservative assumption that all of the sulfur dioxide is lost to the atmosphere.

b. Emission Limitations-
5.0 lbs Particulate per batch cycle

Applicable Compliance Method-

This emission limitation is based upon the maximum cuprous chloride usage rate and the conservative assumption that all of the cuprous chloride is lost to the atmosphere as PE.

c. Emission Limitations-
8.4 TPY SO₂

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined sulfur dioxide usage, as specified in Section C.1, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

d. Emission Limitations-
7.0 TPY Particulate

Applicable Compliance Method-

Compliance shall be determined by multiplying the annual combined cuprous chloride usage, as specified in Section C.2, by the annual number of batches for this emissions unit, as specified in Section C.3, and dividing by the combined annual number of batches for emissions units P001, P002, P003 and P005, as specified in Section C.4.

e. Emission Limitations-
5% opacity visible emission limitation, as a six minute average.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: P002

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999. The emissions units P002 was previously allowed 4.2 TPY SO₂. The new allowable emissions limitation is 8.4 TPY SO₂ and this represents a net increase in SO₂ emissions of 4.2 TPY from emission unit P002.

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> |
|---|--------------------------------------|--|
| K001 - Electric Lehr furnace | OAC rule 3745-31-05(A)(3) | Organic compound (OC) emissions shall not exceed 4.2 lbs/hr, 100.8 lbs/day, and 18.4 TPY (as isopropyl alcohol). |
| | OAC rule 3745-21-07 (G)(9)(f) | The OC limit specified by this rule is equivalent to that specified by OAC rule 3745-31-05. (See A.2.a.) |

2. **Additional Terms and Conditions**

- 2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The OC content of each coating and photochemically reactive cleanup material, in pounds per gallon.

- d. The number of gallons of photochemically reactive cleanup material recovered.
- e. The total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (the sum of (b) times (c) minus the sum of (d) times (c)).
- f. The total number of hours the emissions unit was in operation.
- g. The average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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

Pollutant: Isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 18.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 693

MAGLC (ug/m3): 9830

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 4.2 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 100.8 pounds per day, and the actual OC emissions for each such day.

The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: K001

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation-
4.2 lbs/hr OC

Applicable Compliance Method-

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

- b. Emission Limitation-
100.8 lbs/day OC

Applicable Compliance Method-

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

- c. Emission Limitation-
18.4 TPY OC

Applicable Compliance Method-

Compliance shall be determined by summing the daily emissions, in pounds as specified in Section C.1., for the calendar year and dividing this sum by 2000 lbs/tons.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999.

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> |
|--|--------------------------------------|---|
| K002 - Small paint booths (2) (*Modification) | OAC rule 3745-31-05(A)(3) | Organic compounds (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day, and 7.3 TPY OC, including cleanup material. |
| | OAC rule 3745-21-07(G)(2) | The OC limit specified by this rule is equivalent to that specified by OAC rule 3745-31-05 |

2. **Additional Terms and Conditions**

- 2.a None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The OC content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The number of gallons of photochemically reactive cleanup material recovered.

- e. The total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (the sum of (b) times (c) minus the sum of (d) times (c)).
- f. The total number of hours the emissions unit was in operation.
- g. The average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

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

Pollutant: Benzene

TLV (mg/m3): 1.59

Maximum Hourly Emission Rate (lbs/hr): 0.009

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.6948

MAGLC (ug/m3): 15.0

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 589.77

Maximum Hourly Emission Rate (lbs/hr): 1.72

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 126.0

MAGLC (ug/m3): 5897.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the

permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: K002

- b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation-
8 lbs/hr OC, including cleanup

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

- b. Emission Limitation-
40 lbs/day OC, including cleanup

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

- c. Emission Limitation-
7.3 TPY OC, including cleanup

Applicable Compliance Method-

Compliance shall be determined by summing the daily emissions, in pounds as specified in Section C.1., for the calendar year and dividing this sum by 2000 lbs/ton.

F. Miscellaneous Requirements

1. The emissions units K005, previously permitted under PTI #08-03921, will be shut down. The production for this booth will be added to emissions unit K002. According to PTI #08-03921, the allowable emissions for K002 and K005 were 1.62 TPY OC and 16.2 TPY respectively. The combination of these two units represents a net decrease in allowable OC emissions of 10.52 TPY from these emission units. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999.

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> |
|---|--|--|
| K003 - Large paint booth (**Modification) | OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(2) | Organic compounds (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day, and 4.9 TPY OC, including cleanup material. The OC limit specified by this rule is equivalent to that specified by OAC rule 3745-31-05. |

2. **Additional Terms and Conditions**

- 2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operations:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The OC content of each coating and photochemically reactive cleanup material, in pounds per gallon.

- d. The number of gallons of photochemically reactive cleanup material recovered.
- e. The total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day (the sum of (b) times (c) minus the sum of (d) times (c)).
- f. The total number of hours the emissions unit was in operation.
- g. The average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

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

Pollutant: Ethyl Acrylate

TLV (mg/m3): 20.47

Maximum Hourly Emission Rate (lbs/hr): 0.013

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2730

MAGLC (ug/m3): 204.7

Pollutant: Methyl ethyl ketone

TLV (mg/m3): 589.77

Maximum Hourly Emission Rate (lbs/hr): 1.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.76

MAGLC (ug/m3): 5897.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

Jafe Decorating Co Inc

PTI Application: 08-04375

Modification Issued: 9/30/2004

Facility ID: 0819070215

Emissions Unit ID: K003

- a. An identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
- b. An identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation-
8 lbs/hr OC, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section C.1.
 - b. Emission Limitation-
40 lbs/day OC, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section C.1.
 - c. Emission Limitation-
4.91 TPY OC, including cleanup

Applicable Compliance Method-

Compliance shall be determined by summing the daily emissions, in pounds as specified in Section C.1., for the calendar year and dividing this sum by 2000 lbs/ton.

F. Miscellaneous Requirements

1. This permit supercedes the requirements of PTI 08-3921, issued September 1, 1999. The hourly and daily emission limit has been increased to 8.0 lbs/hr and 40.0 lbs/day. The annual limit has not been increased. It remains the same, 4.91 TPY, as listed in PTI #08-03921.