

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "08-04937"

A. Source Description

Neaton Auto Products Manufacturing, Inc. a Title V facility is a manufacturer of various coated plastic parts for various automotive manufacturers. The facility is requesting permission to install a new TK4 glue booth, with this installation the permittee has discovered that the potential emissions of VOC is greater than 250 TPY making this facility subject to PSD permitting review. The permittee wants to limit the VOC usage below the major threshold (250 TPY). Therefore, through the limitation of VOC emissions they will become a synthetic minor facility and avoid PSD permitting review.

B. Facility Emissions and Attainment Status

The facility is located in Preble county which is currently designated as attainment for ozone. Without synthetic minor restrictions the facility is a major source for PSD.

C. Source Emissions

The potential emissions of VOC from this facility without any federal enforceable restrictions is greater than 250 TPY. Neaton Auto is a Title V facility with synthetic minor limits on single and combined HAP emissions to avoid MACT, and potentially a major source for PSD. The permittee is seeking to restrict the PTE of the emission units at this facility by proposing a synthetic minor limitation of 215.72 TPY for VOC. The permittee is requesting that the annual VOC limits for existing paint booth #6 (P020 - 21.20 TPY), paint booth #2 (K021 - 4.81 TPY) and the new emissions unit (R004 - 21.39 TPY) be made federally enforceable for PTE purposes.

D. Conclusion

Neaton Auto Products Mfg., Inc., will be a synthetic minor facility to avoid PSD review and permitting requirements by limiting the VOC emissions to below PSD permitting review threshold level. Monthly monitoring, record keeping and reporting requirements will be required to ensure compliance. Therefore, through federally enforceable terms and conditions, Neaton Auto will not trigger PSD permitting review.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
PREBLE COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 08-04937

Fac ID: 0868030155

DATE: 6/12/2008

Neaton Auto Products Mfg Inc
Eric Harper
975 S Franklin St
Eaton, OH 45320-0000

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, 43216-1049.

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 **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

RAPCA

TOLEDO METRO AREA COUNCIL OF GOVTS.

IN

KY

PREBLE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04937 FOR AN AIR CONTAMINANT SOURCE
FOR Neaton Auto Products Mfg Inc

On 6/12/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Neaton Auto Products Mfg Inc**, located at **975 S Franklin St, Eaton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04937:

Synthetic Minor to avoid PSD, installation of a newTK4 Glue Booth. Administrative modification os existing emissions units K020 and K021.

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**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 08-04937

Application Number: 08-04937
Facility ID: 0868030155
Permit Fee: **To be entered upon final issuance**
Name of Facility: Neaton Auto Products Mfg Inc
Person to Contact: Eric Harper
Address: 975 S Franklin St
Eaton, OH 45320-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**975 S Franklin St
Eaton, Ohio**

Description of proposed emissions unit(s):
Synthetic Minor to avoid PSD, installation of a newTK4 Glue Booth. Administrative modification os existing emissions units K020 and K021.

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

Chris Korleski
Director

Neaton Auto Products Mfg Inc
PTI Application: 08-04937
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0868030155

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

Neaton Auto Products Mfg Inc
PTI Application: 08-04937
Issued: To be entered upon final issuance

Facility ID: 0868030155

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Neaton Auto Products Mfg Inc
PTI Application: 08-04937
Issued: To be entered upon final issuance

Facility ID: 0868030155

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not

11

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

cause a public nuisance, in violation of OAC rule 3745-15-07.

Neaton Auto Products Mfg Inc
PTI Application: 08-04937
Issued: To be entered upon final issuance

Facility ID: 0868030155

13. Permit-To-Install

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

Neaton Auto Products Mfg Inc

PTI Application: 08-04937

Issued: To be entered upon final issuance
of any transfer of this permit.

Facility ID: 0868030155

Neaton Auto Products Mfg Inc

PTI Application: 08-04937

Issued: To be entered upon final issuance

Facility ID: 0868030155

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 374531-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
volatile organic compound	47.40
particulate	7.23

Neaton Auto Products Mfg Inc

Facility ID: 0868030155

PTI Application: 08-04937

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K020) - Paint booth No. 6; coating of plastic parts installed Pre Aug. 3rd, 2006 (Administrative Modification)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.44 lbs/hr excluding cleanup.</p> <p>The particulate emissions (PE) from this emissions unit shall not exceed 2.41 tons/yr. See A.I.2.d</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), 3745-21-07(G)(9), OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(A)(1).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD applicability)	<p>The VOC emissions and usages from this emissions unit shall not exceed 21.20 tons per year (TPY) as a rolling 12-month summation, including both coating and cleanup materials.</p> <p>See A.I.2.b.</p>
OAC rule 3745-21-07(G)(9)	See A.I.2.c.
OAC rule 3745-17-11(B)(1)	<p>The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr.</p> <p>See A.I.2.d.</p>
OAC rule 3745-17-07(A)(1)	The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The hourly VOC emission limitation was established to reflect 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.
- 2.b This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month

Emissions Unit ID: K020

summation of the VOC usage, upon issuance of this permit. The VOC usage rate from this emissions unit shall not exceed 21.20 TPY, based upon a rolling, 12-month summation of the monthly usage rate.

- 2.c** This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, OAC rule 3745-21-07(G)(9) and section A.I.2.c. will be voided.]

- 2.d** On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- 2.e** The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the volatile organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission from all coatings and cleanup materials, in tons per month;
 - e. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC

Emissions Unit ID: K020

emissions.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage limitations for VOC.
2. These quarterly deviation (excursion) reports shall be submitted to the Director (appropriate District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section IV.3 shall be voided.]

4. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 26.44 lbs/hr excluding cleanup.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emissions limitation may be determined by multiplying the maximum VOC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

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- b. Emission Limitation:
The VOC emissions and usages from this emissions unit shall not exceed 21.20 TPY as a rolling, 12-month summation, including both coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1.e.

- c. Emission Limitation:
The PE from this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$$

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
The PE emissions from this emissions unit shall not exceed 2.41 tons/yr

Applicable Compliance Method:
The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[Note: After the revision to OAC rule 3745-17-11(C) is approved into the Ohio SIP, Section V.1.c. and d. shall be voided.]

Issued: To be entered upon final issuance

- e. Emission Limitation-
Visible emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method-

If required, compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- 2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

- 1. Terms in this permit supercede those identified in PTI 08-04363 issued 05/23/2002.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K020) - Paint booth No. 6; coating of plastic parts installed Pre Aug. 3rd, 2006 (administrative modification)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-11(C)	See sections B.II.1, 2, B.III. 2-7 and B.IV.1.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

1. The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
2. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions units (K020 and K021) were 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 for all the injection mold groups combined. 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):

Issued: To be entered upon final issuance

Emissions Unit ID: K020

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Pollutant: *Toluene

TLV (ug/m3): 188,404

Maximum Hourly Emission Rate (lbs/hr): 12.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,041.1

MAGLC (ug/m3): 4,476.19

- * The worst case scenario was using the lowest TLV of Toluene and the highest emission rate of n-Butyl acetate, the Predicted 1 hour n-Butyl MAGLC was less than the MAGLC for the Toluene.

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.).

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

Emissions Unit ID: K020

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.

2. 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.
3. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
4. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA District Office or local air agency upon request.
5. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
6. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

7. The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K021) - Paint booth No.2; coating of plastic parts installed Pre-Aug. 3rd, 2006 administrative modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6.68 lbs/hr excluding cleanup.</p> <p>The particulate emissions (PE) from this emissions unit shall not exceed 2.41 tons/yr. See A.I.2.d</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), 3745-21-07(G)(9), OAC rule 3745-17-11(B)(1) and OAC rule 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD applicability)	<p>The VOC emissions and usages from this emissions unit shall not exceed 4.81 tons per year (TPY) as a rolling 12-month summation from coating and cleanup materials.</p> <p>See A.I.2.b.</p>
OAC rule 3745-21-07(G)(9)	See A.I.2.c.
OAC rule 3745-17-11(B)(1)	<p>The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr.</p> <p>See A.I.2.d.</p>
OAC rule 3745-17-07(A)(1)	The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a The hourly VOC emission limitation was established to reflect 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.

2.b This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month

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summation of the VOC usage, upon issuance of this permit. The VOC usage rate from this emissions unit shall not exceed 4.81 TPY, based upon a rolling, 12-month summation of the monthly usage rate.

- 2.c** This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, OAC rule 3745-21-07(G)(9) and section A.I.2.c. will be voided.]

- 2.d** On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- 2.e** The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the volatile organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission from all coatings and cleanup materials, in tons per month;

Emissions Unit ID: K021

- e. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage limitations for VOC.
2. These quarterly deviation (excursion) reports shall be submitted to the Director (appropriate district Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section IV.3 shall be voided.]

4. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 6.68 lbs/hr excluding cleanup.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be

Emissions Unit ID: K021

Issued: To be entered upon final issuance

determined by multiplying the maximum VOC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

Issued: To be entered upon final issuance

- b. Emission Limitation:
The VOC emissions and usages from this emissions unit shall not exceed 4.81 TPY as a rolling, 12-month summation, including both coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1.e.

- c. Emission Limitation:
The PE from this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$

$E = \text{PE rate, in pounds per hour}$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
The PE emissions from this emissions unit shall not exceed 2.41 tons/yr

Applicable Compliance Method:
The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[Note: After the revision to OAC rule 3745-17-11(C) is approved into the Ohio SIP, Section V.1.c. and d. shall be voided.]

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- e. Emission Limitation-
Visible emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method-

If required, compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- 2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

- 1. Terms in this permit supercede those identified in PTI 08-04363 issued 05/23/2002.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K021) - Paint booth No.2; coating of plastic parts installed Pre-Aug. 3rd, 2006 administrative modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-11(C)	See sections B.II.1, 2, B.III. 2-7 and B.IV.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
2. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions units (K020 and K021) were 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 for all the injection mold groups combined. 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):

Issued: To be entered upon final issuance

Pollutant: *Toluene

TLV (ug/m3): 188,404

Maximum Hourly Emission Rate (lbs/hr): 12.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,041.1

MAGLC (ug/m3): 4,476.19

- * The worst case scenario was using the lowest TLV of Toluene and the highest emission rate of n-Butyl acetate, the Predicted 1 hour n-Butyl MAGLC was less than the MAGLC for the Toluene.

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.).

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

Emissions Unit ID: K021

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.

2. 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.
3. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
4. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA District Office or local air agency upon request.
5. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
6. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

Issued: To be entered upon final issuance

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

7. The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R004) - TK Glue booth-automatic adhesive spray booth installed post Aug, 3rd 2006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 19.97 pounds per hour excluding cleanup.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B)(1) and 3745-17-07(A)(1).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD applicability)	<p>The VOC emissions and usages from this emissions unit shall not exceed 21.39 tons per year (TPY) as a rolling 12-month summation, including both coating and cleanup materials.</p> <p>See A.I.2.b.</p>
OAC rule 3745-21-07(G)(9)	See A.I.2.c.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.d.
OAC rule 3745-17-11(B)(1)	<p>The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr.</p> <p>See A.I.2.e.</p>
OAC rule 3745-17-07(A)(1)	The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The hourly VOC emission limitation was established to reflect 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.
- 2.b The VOC usage rate from this emissions unit shall not exceed 21.39 TPY, based upon a rolling, 12-month summation of the monthly usage rates.

Issued: To be entered upon final issuance

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Usage Rate of VOC (Tons)</u>
1	5
1-2	10
1-3	15
1-4	20.
1-5	21.39
1-6	21.39
1-7	21.39
1-8	21.39
1-9	21.39
1-10	21.39
1-11	21.39
1-12	21.39

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage rate limitation for VOC shall be based upon a rolling, 12-month summation of the monthly VOC usage rates.

- 2.c** This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, OAC rule 3745-21-07(G)(9) and section A.I.2.c. will be voided.]

- 2.d** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emissions rate for PE is less than 10 tons/yr taking into account the federally enforceable rule limit of 0.551 lb/hr under OAC rule 3745-17-11(B).

Issued: To be entered upon final issuance

- 2.e** On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- 2.f** The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the volatile organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission from all coatings and cleanup materials, in tons per month;
 - e. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

IV. Reporting Requirements

Emissions Unit ID: R004

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission and usage limitations for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels.
2. These quarterly deviation (excursion) reports shall be submitted to the Director (appropriate district Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, Section IV.3 shall be voided.]

4. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 19.97 lbs/hr excluding cleanup.

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr).
 - b. Emission Limitation:
The VOC emissions and usages from this emissions unit shall not exceed 21.39 TPY as a rolling, 12-month summation, including both coatings and cleanup materials.

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1.e.

c. Emission Limitation:

The PE from this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst-case rate for PE, the following equation may be used:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, compliance with the hourly allowable PE limitation shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

The PE from this emissions unit shall not exceed 2.41 tons/yr

Applicable Compliance Method:

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[Note: After the revision to OAC rule 3745-17-11(C) is approved into the Ohio SIP, Section V.1.c and d shall be voided.]

e. Emission Limitation-

Visible emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method-

If required, compliance shall be determined by visible emissions evaluations

Neaton Auto Products Mfg Inc

DTI Application: 08-04027

Facility ID: 0868030155

Emissions Unit ID: R004

performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R004) - TK Glue booth-automatic adhesive spray booth installed post Aug, 3rd 2006.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-11(C)	See sections B.II.1, 2, B.III.1-9 and B.IV.2.
ORC 3704.03(F) and OAC rule 3745-114-01	See sections B.III.1-4. and B.IV.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
2. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit R004 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 application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application;

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and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Emissions Unit ID: R004

Toxic Contaminant:
Methanol

TLV (mg/m³):

Maximum Hourly Emission Rate (lbs/hr): 1.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 195.92MAGLC (ug/m³): 6,262

Toxic Contaminant:
Cyclohexane

TLV (mg/m³): 345

Maximum Hourly Emission Rate (lbs/hr): 7.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 811.68MAGLC (ug/m³): 8,214

The permittee, has demonstrated that emissions of Methanol and Cyclohexane, from emissions unit(s) R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change

Emissions Unit ID: R004

and if the change would increase the ground-level concentration.

5. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
6. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA District Office or local air agency upon request.
7. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
8. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

9. The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or

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local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation.

These quarterly deviation (excursion) reports shall be submitted to the Director (appropriate district Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

V. Testing Requirements

None

Neaton Auto Products Mfg Inc
DTI Application: 08 04027

Facility ID: 0868030155

Emissions Unit ID: R004

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04937 Facility ID: 0868030155

FACILITY NAME Neaton Auto Products Mfg Inc

FACILITY DESCRIPTION production of various coated plastic parts CITY/TWP Eaton

SIC CODE 3714 SCC CODE 4-02-00-410 EMISSIONS UNIT ID K020

EMISSIONS UNIT DESCRIPTION Paint booth No. 6; coating of plastic parts installed Pre Aug. 3rd, 2006

DATE INSTALLED already installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment			0.551 lb/hr	2.41
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			26.44 lbs/hr	21.20
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the applicable OAC rules, 12-month rolling VOC usage restriction, monitoring, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Toulene

NEW SOURCE REVIEW FORM B

PTI Number: 08-04937 Facility ID: 0868030155

FACILITY NAME Neaton Auto Products Mfg Inc

FACILITY DESCRIPTION production of various coated plastic CITY/TWP Eaton

Emissions Unit ID: R004

SIC CODE 3714 SCC CODE 4-020-0410 EMISSIONS UNIT ID K021

EMISSIONS UNIT DESCRIPTION Paint booth No.2; coating of plastic parts installed Pre-Aug. 3rd, 2006

DATE INSTALLED alreadyinstalled

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment			0.551 lb/hr	2.41
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			6.68 lbs/hr	4.81
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the applicable OAC rules, 12-month rolling VOC usage restriction, monitoring, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Toulene

NEW SOURCE REVIEW FORM B

PTI Number: 08-04937 Facility ID: 0868030155

FACILITY NAME Neaton Auto Products Mfg Inc

FACILITY DESCRIPTION production of various coated plastic CITY/TWP Eaton

Emissions Unit ID: R004

SIC CODE 3714 SCC CODE 4-020-0410 EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION TK Glue booth-automatic adhesive spray booth installed post Aug, 3rd 2006.

DATE INSTALLED after PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment			0.551 lb/hr	2.41
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment			19.37 lbs/hr	21.39
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the applicable OAC rules, 12-month rolling VOC usage restriction, monitoring, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Y

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: Methanol and Cyclohexane