

ADDITIONAL TERMS AND CONDITIONS

1. VISIBLE EMISSION LIMIT

Visible particulate emissions from any stack shall not exceed 20 per cent opacity, as a 6-minute average, except for a period of 6 consecutive minutes in any 60 minutes. Visible particulate emissions shall not exceed 60 percent opacity, as a 6-minute average, at any time.

2. COATING LIMIT FOR THE FLAT LINE

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be employed in R001.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

3. CLARIFICATION OF DRYING OVENS

The ovens associated with R001 and R002 are not subject to the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(1) because no baking or heat curing of the coatings occurs in the flashoff and drying oven.

4. OPERATIONAL RESTRICTION

The total quantity of OC applied (emitted) in R001, R002, and R003 shall not exceed 64.6 tons per rolling, 12-month period.

5. COMPLIANCE WITH THE AIR TOXICS POLICY

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5635. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the xylene, ethanol, and butyl acetate emission limitations specified in this permit for combined emissions units R001, R002, and R003 were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions units' exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 6.0

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2292

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

Pollutant: Ethanol

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 58.96

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9640

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44762

Pollutant: Butyl Acetate

TLV (ug/m3): 713,000

Maximum Hourly Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2000

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16976

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

- i. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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 specified in the above table;
- ii. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
- iii. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01(B)(6)]; and

- iv. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be

considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

6. MONITORING AND RECORDKEEPING REQUIREMENTS

The permittee shall collect and record the following information each month for R001, R002, and R003 separately:

- i. The name and identification number of each coating, thinner, and cleanup material and a statement as to whether or not each is a "photochemically reactive material".
- ii. The OC content of each coating, thinner, and cleanup material, in pounds per gallon.
- iii. The number of gallons of each coating, thinner, and cleanup material employed.
- iv. The total OC emissions (OC applied) from all coatings, thinners, and cleanup materials employed [the sum of (6.ii times 6.iii) for all coatings, thinners, and cleanup materials], in pounds or tons.
- v. The rolling, 12-month summation of the total OC emissions for R001, R002, and R003 combined.

In addition, the permittee shall collect and record the following information each month for R002, and R003 separately:

- vi. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
- vii. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
- viii. For each day during which a photochemically reactive material is

employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (6.vi divided by 6.vii), 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 definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

7. REPORTING REQUIREMENTS

- i. The permittee shall submit quarterly reports which include the total OC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, and R003, in tons, for each calendar month. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include information for each month during the previous calendar quarter.
- ii. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in R001. These reports shall be submitted within 30 days after the occurrence.
- iii. The permittee shall submit deviation (excursion) reports for R002 and/or R003, within 30 days after the occurrence, which include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

8. COMPLIANCE DETERMINATIONS

- i. Compliance with the pounds OC per hour emission limit for R001 shall be demonstrated by multiplying the maximum number of gallons of coating that can theoretically be applied per hour (based on the maximum design capacities of the booths) times the highest OC content coating. No additional record keeping is necessary to demonstrate compliance with this limit because the limit cannot

be exceeded under current conditions.

- ii. Compliance with the emission limitations of 8 pounds OC per hour and 40 pounds of OC per day for R002 and R003 shall be based upon the recordkeeping specified in 6.viii and 6.vi respectively.
- ii. Compliance with the air toxics requirements have been determined by modeling the maximum total combined emission rates for R001-R003 to determine the predicted 1-hour maximum ground-level concentration at the fenceline. Therefore, the hourly emission rates can not be exceeded under current conditions. As required above and by OAC rule 3745-31-02, any change in the coatings used or in the operation of the emissions units which would increase the emission rate of any individual air toxic would require a new permit to install.
- iii. Compliance with the rolling, 12-month emission limitations and usage restrictions above for OC shall be determined in accordance with the following method:

Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings, thinners, and cleanup materials. The OC emission rate and usage restrictions for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate OC content determined for that material. The OC emission rate and usage rate for each month shall be calculated by adding the emission rates and usage rates for all coatings, thinners, and cleanup materials employed during the month. The rolling, 12-month summations for total OC shall be calculated each month by adding the OC emission rate for that month to the OC emission rate for the previous 11 calendar months (this same method shall be used to calculate rolling, 12-month usage).
- iv. Compliance with the visible particulate emission limit shall be determined in accordance with OAC rule 3745-17-03.
- v. Compliance with the particulate matter emission limit of of 0.551 pound per hour shall be determined based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
- vi. Compliance with the annual particulate matter emission limit shall be determined by multiplying the tested particulate matter emission rate, in pound(s) per hour, by the actual hours of operation per year.