



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

09/26/01

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

08-57-04-0931
Delphi Chassis Systems, Home Avenue
Paul Schubert
P.O. Box 1224
Mail Code V-53
Dayton, OH 45401

Dear Paul Schubert:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging 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.

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

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: RAPCA
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 09/26/01

Effective Date: 09/26/01

Expiration Date: 09/26/06

This document constitutes issuance of a Title V permit for Facility ID: 08-57-04-0931 to:
Delphi Chassis Systems, Home Avenue
2701 Home Avenue
Dayton, OH 45417

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units B505, B506, K007, K008, K009, K010, K011, K012, K013, K014, K015, K017, K018, P523, P524, P525, and P526.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Handwritten signature of Christopher Jones
Christopher Jones

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 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 to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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. 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.

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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. 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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- F001: Roadways and Parking Lots
- P003: Rubber Finishing
- P005: Drill and Tap Machines
- P006: Drill, Grind, & Scratch Machines
- P018: M/M RM Pressline #1
- P502: Mounts Pleb Insert Prep
- P505: Liteflex Springs Mfg. #1
- P506: Liteflex Springs Mfg. #2
- P507: Liteflex Springs Mfg. #3
- P508: Liteflex Springs Mfg. #4
- P509: Liteflex Springs Mfg. #5
- P510: Liteflex Springs Mfg. #6
- P511: Liteflex Springs R & D
- P512: Composite Material Product R & D
- P513: LS R/C Bulk Handling
- P514: Creel Room Fume Hood
- P515: Rubber Mills
- P516: Rubber Mixers
- P517: Carbon Black Silo
- P518: Grinders, Saws, and Filers
- P519: Grinders
- P520: Grinder
- P521: Grinder
- P522: Carpenter Shop
- Z001: Cold Cleaner
- Z002: Cold Cleaner
- Z003: Welding Station
- Z004: Abrasive Blast Booth
- Z005: Machining Equipment
- Z006: Cold Cleaners
- Z007: Weld Shop
- Z008: Cold Cleaners
- Z009: Rubber Presses
- Z010: Crimping Machines
- Z011: Robot Assembly
- Z012: Drilling Cells
- Z013: Cure Oven
- Z014: Epoxy Dispensing
- Z015: Cold Cleaner
- Z016: Dip Tank
- Z017: Rivet Station
- Z018: Solvent Tank
- Z019: AQ Primer
- Z020: AQ Primer
- Z021: Test Stand
- Z022: Glue Pump Station
- Z023: Grit Blaster
- Z024: Rubber Press
- Z025: Machining Equipment
- Z026: Scratch Brush Stations/Grinders
- Z028: Solvent Cleaners
- Z029: Welding
- Z030: Basement Tool and Model Shop
- Z031: Engine Mount Test Lab
- Z032: Solvent Cleaner
- Z033: Basement Testing Area
- Z034: Grinder
- Z035: Solvent Cleaners
- Z036: Lab Paint Booth
- Z037: Rubber Presses

- B. State Only Enforceable Section**
- Z037: Rubber Presses
 - Z039: Life Truck Repair Room
 - Z040: Solvent Cleaner
 - Z041: Grinding Station
 - Z042: Natural Gas Fired Heating System
 - Z043: Rubber Presses
 - Z044: Assembly

 - Z045: Ransohoff Washing Unit
 - Z046: Lab Dieffenbacher Press
 - Z047: Mount Prototype Lab
 - Z048: Autophoretic Coating Line
 - Z049: Multipress
 - Z050: #1 Desma Inject Unit
 - Z051: PH Dial Table North J Torque Strut
 - Z052: Mobile Spray Unit 2
 - Z053: Labeling System
 - Z054: Solvent Cleaner
 - Z056: Portable Fuel Container
 - Z057: Alkaline Etch
 - Z058: Electric Oven
 - Z059: Phosphating Line and Sludge Tank
 - Z060: Abrasive Blasting Blaster
 - Z061: Parts Washer
 - Z062: Paint Dobber
 - Z063: Omega Bolt Stakers
 - Z064: Wastewater Treatment Operations
 - Z065: Gear Oil Storage
 - Z066: Pin Insert Assembly
 - Z067: Strut Dial Assembly
 - Z068: Dial Staker
 - Z069: PH Press Conveyors
 - Z070: Rubber Presses
 - Z071: Drills, Lathes, & Sanders
 - Z072: Epoxy Curative Tank
 - Z073: Epoxy Resin Tank
 - Z074: Saws
 - Z075: Machining Operations
 - Z076: Radial Saw
 - Z077: Grinding Operations
 - Z078: Machining Operations in Re-Op Area
 - Z079: Gear Oil Tanks
 - Z080: Solvent Cleaners
 - Z081: Cabosil Mix Area
 - Z082: Maintenance Solvent Cleaners
 - Z083: Solvent Cleaners
 - Z084: Fire Suppression System
 - Z085: AQ Primer
 - Z086: AQ Primer

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the source(s).
3. This permittee is hereby notified that this permit and all Agency records concerning the operation of these permitted emissions units are subject to public disclosure in accordance with OAC rule 3745-49-03.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #7 (B505)
Activity Description: Natural Gas Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05(A)(3) PTI #08-4035	particulate emissions (PE): 4.77 TPY sulfur dioxide (SO ₂): 0.0006 lb/mmBtu of actual heat input; 0.14 TPY nitrogen oxides (NO _x): 0.08 lb/mmBtu of actual heat input; 19.1 TPY volatile organic compounds (VOC): 0.0055 lb/mmBtu of actual heat input; 1.31 TPY carbon monoxide (CO): 0.073 lb/mmBtu of actual heat input; 17.4 TPY Visible emissions shall not exceed 10% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirement of OAC rule 3745-17-10(B)(1).
	OAC rule 3745-17-10 (B)(1)	0.020 pound of PE per mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart Dc	exempt (See Section A.II.1.)

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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:

- 1.a Emission Limitation-
4.77 TPY PE

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.b Emission Limitation-
0.0006 pound SO₂/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 pound SO₂/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation-
0.14 TPY SO₂

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.d Emission Limitation-
0.08 lb NO_x/mmBtu

Applicable Compliance Method-

The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation-
19.1 TPY NO_x

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.f** Emission Limitation-
0.0055 pound VOC/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-3 (revised 2/98) of 5.5 pounds VOC/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

- 1.g** Emission Limitation-
1.31 TPY VOC

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.h** Emission Limitation-
0.073 pound CO/mmBtu of actual heat input

Applicable Compliance Method-

Compliance shall be based upon a manufacturer-guaranteed emission factor of 0.073 lb CO/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

- 1.i** Emission Limitation-
17.4 TPY CO

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.j** Emission Limitation-
Visible emissions shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method-

If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.k** Emission Limitation-
0.020 lb PE per mmBtu actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

- 2.** Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit to demonstrate compliance with the allowable mass emissions rate for NOx. The emissions test(s) shall be conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #8 (B506)
Activity Description: Natural Gas Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05(A)(3) PTI #08-4035	particulate emissions (PE): 4.77 TPY sulfur dioxide (SO ₂): 0.0006 lb/mmBtu of actual heat input; 0.14 TPY nitrogen oxides (NO _x): 0.08 lb/mmBtu of actual heat input; 19.1 TPY volatile organic compounds (VOC): 0.0055 lb/mmBtu of actual heat input; 1.31 TPY carbon monoxide (CO): 0.073 lb/mmBtu of actual heat input; 17.4 TPY Visible emissions shall not exceed 10% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirement of OAC rule 3745-17-10(B)(1).
	OAC rule 3745-17-10 (B)(1)	0.020 pound of PE per mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart Dc	exempt (See Section A.II.1.)

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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:

- 1.a Emission Limitation-
4.77 TPY PE

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.b Emission Limitation-
0.0006 pound SO₂/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 pound SO₂/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

- 1.c Emission Limitation-
0.14 TPY SO₂

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.d Emission Limitation-
0.08 lb NO_x/mmBtu

Applicable Compliance Method-

The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation-
19.1 TPY NO_x

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.f** Emission Limitation-
0.0055 pound VOC/mmBtu of actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-3 (revised 2/98) of 5.5 pounds VOC/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

- 1.g** Emission Limitation-
1.31 TPY VOC

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.h** Emission Limitation-
0.073 pound CO/mmBtu of actual heat input

Applicable Compliance Method-

Compliance shall be based upon a manufacturer-guaranteed emission factor of 0.073 lb CO/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

- 1.i** Emission Limitation-
17.4 TPY CO

Applicable Compliance Method-

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/mmBtu emission limitation is maintained (the annual emission limitation was calculated by multiplying the lb/mmBtu emission limitation by the maximum heat input capacity to the boiler (mmBtu/hr) and by 8760, and then dividing by 2000).

- 1.j** Emission Limitation-
Visible emissions shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method-

If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.k** Emission Limitation-
0.020 lb PE per mmBtu actual heat input

Applicable Compliance Method-

The permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

2. Approximately 2.5 years after permit issuance and within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit to demonstrate compliance with the allowable mass emissions rate for NOx. The emissions test(s) shall be conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dipline A and Oven (K007)
Activity Description: Dipline A and Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dipline A and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	1,582 lbs/month and 9.49 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - the temperature immediately upstream of the incinerator's catalyst bed; and
 - the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

7. The permittee shall collect and record the following information each day for this emissions unit:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 1,582 lbs, and the actual monthly VOC emission rate for each such month;
 - an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
1,582 lbs/month VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
 - 1.b Emission Limitation -
9.49 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dipline B and Oven (K008)
Activity Description: Dipline B and Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dipline B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	815 lbs/month and 4.89 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - the temperature immediately upstream of the incinerator's catalyst bed; and
 - the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

7. The permittee shall collect and record the following information each day for this emissions unit:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 1,582 lbs, and the actual monthly VOC emission rate for each such month;
 - an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
815 lbs/month VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
 - 1.b Emission Limitation -
4.89 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #1A and 2 Ovens (K009)
Activity Description: COE Line #1A and 2 Ovens

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #1 A and 2 ovens, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	53.93 lbs/day and 9.84 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - the temperature immediately upstream of the incinerator's catalyst bed; and
 - the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.93 lbs, and the actual daily VOC emission rate for each such day;
 - an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
53.93 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
9.84 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
 - d. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - e. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #1B and 1 Oven (K010)
Activity Description: COE Line #1B and 1 oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #1 B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	29.74 lbs/day and 5.43 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 29.74 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
29.74 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
5.43 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #2B and 2 Ovens (K011)
Activity Description: COE Line #2 and 2 ovens

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #1 B and 2 ovens, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	53.93 lbs/day and 9.84 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a** The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b** The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c** The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - the temperature immediately upstream of the incinerator's catalyst bed; and
 - the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.93 lbs, and the actual daily VOC emission rate for each such day;
 - an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
53.93 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
9.84 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #3A/#3B and 1 Oven (K012)
Activity Description: COE Line #3A/#3B and 1 oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #3 A/ #3 B and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	53.48 lbs/day and 10.86 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a** The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b** The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c** The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 53.48 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
53.48 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
10.86 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #4 and 1 Oven (K013)
Activity Description: COE Line #4 and 1 oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #4 and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	33.20 lbs/day and 6.06TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a** The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b** The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c** The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
- the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - the temperature immediately upstream of the incinerator's catalyst bed; and
 - the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
- an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 33.20 lbs, and the actual daily VOC emission rate for each such day;
 - an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
33.20 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
6.06 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
 - d. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - e. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COE Line #5 and 1 Oven (K014)
Activity Description: COE Line #4 and 1 oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
COE line #5 and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	33.20 lbs/day and 6.06TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 33.20 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
- 3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

- 1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
33.20 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
6.06 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Robotic Spray & Manual Dip Tank and 1 Oven (K015)
Activity Description: Robotic Spray and Manual Dip Tank and 1 Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
manual dip tank and oven, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	2,238 lbs/month and 13.43TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate) for all the coatings and cleanup materials employed, i.e., the summation of (b x c) for all coatings + the summation of (d x e) for all cleanup materials, in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]
2. The permittee shall calculate and record each month the total VOC emission rate, in pounds, for this emissions unit (the monthly VOC emission rate shall be calculated by summing the daily VOC emission rates, from Section 1.g above, for the calendar month).
3. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
4. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
5. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

7. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each month during which the total controlled VOC emission rate for this emissions unit exceeded the allowable monthly emission limit of 2,238 lbs, and the actual monthly VOC emission rate for each such month;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and

IV. Reporting Requirements (continued)

- g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
2,238 lbs/month VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Sections III.1. and III.2. of this permit.
 - 1.b Emission Limitation -
13.43 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.2. of this permit and shall be the summation of the monthly VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.3. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.

V. Testing Requirements (continued)

2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.

The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
 - d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Mixing Room (K017)
Activity Description: Adhesive Mixing Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive mixing room, miscellaneous metal parts, with a permanent total enclosure, fume concentrator, and a catalytic incinerator	OAC rule 3745-31-05(A)(3) PTI # 08-3513	3 lbs/day and 0.55 TPY volatile organic emissions (VOC), including cleanup (for this emissions unit)
	OAC rule 3745-31-05(D) PTI # 08-3513	390.0 TPY VOC usage, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
		39.0 TPY VOC emissions, as a rolling, 365-day summation, for emissions units K007 - K015 and K017, combined, including cleanup
	OAC rule 3745-21-09(B)(6)	See Sections A.I.2.a., A.I.2.b. and A.I.2.c. The control efficiency requirement specified by this rule is less stringent than the overall control efficiency requirement established pursuant to OAC rule 3745-31-05(D).

2. Additional Terms and Conditions

- 2.a The permittee shall control the VOC emissions from emissions units K007 through K015 and K017 through the application of a permanent total enclosure with a 100 % capture efficiency and a fume concentrator and catalytic incinerator system. The fume concentrator and catalytic incinerator system shall have a minimum overall (removal/destruction) efficiency of 90%, by weight, for VOC.
- 2.b The permittee shall maintain a minimum VOC removal efficiency of 91.2%, by weight, for the fume concentrator wheel (the VOC removal efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).
- 2.c The permittee shall maintain a minimum VOC destruction efficiency of 98.5%, by weight, for the catalytic incinerator (the VOC destruction efficiency was determined during the initial performance test, conducted May 17, 2000, that demonstrated the emissions unit was in compliance).

II. Operational Restrictions

1. The coating operations identified as K007 through K015 and the mixing room identified as K017 shall each be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water (the direction of air through all NDOs shall be into the enclosure);
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing a permanent total enclosure, the total VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever the emissions unit is in operation.
3. Each of the ovens associated with emissions units K007 through K015 demonstrated that they meet the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that each PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft opening) which could affect the PTE were opened). Therefore, the permittee will not be required to perform additional monitoring, record keeping and reporting requirements to ensure the ongoing integrity of the PTE for the ovens.
4. The number of revolutions per hour (RPH) for the fume concentrator shall be continuously maintained, when the emissions units are in operation, at a value within +/- 1 RPH of the value established during the most recent emission testing that demonstrated the emissions unit was in compliance. The most recent performance test that demonstrated compliance was conducted on May 17, 2000, with an average RPH of 5.
5. The average temperature of the desorption air stream prior to the fume concentrator wheel, for any 3-hour block of time, shall not be less than 260 degrees Fahrenheit.
6. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The test results showed an average inlet temperature of 595 degrees Fahrenheit and an average temperature difference of 201 degrees Fahrenheit.]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed;
 - e. the VOC content of each cleanup material employed, in pounds per gallon;
 - f. the total uncontrolled VOC usage rate (VOC input rate x 0.01) for all the coatings and cleanup materials employed, i.e., (the summation of (b x c) for all coatings x 0.01*)+ (the summation of (d x e) for all cleanup materials x 0.01*), in pounds; and
 - g. the total calculated controlled VOC emission rate for all the coatings and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated the emissions unit was in compliance, i.e., (f) multiplied by a factor of (1 - the overall control efficiency). [The most recent performance testing that demonstrated the emissions unit was in compliance was conducted on May 17, 2000. The results established an overall control efficiency (capture, removal and destruction) of 91.9%, by weight, for VOC.]

* Emissions unit K017 is employed as a mixing room for all the coatings employed in emissions units K007 through K015. Therefore, to ensure compliance with the overall usage limitation developed under OAC rule 3745-31-05(D), VOC usage for K017 is accounted for as material lost in the mixing process. Based on AP-42, Section 6.4.1 (revised 5/83), 0.01 of the total solvent employed in paint manufacture is lost.
2. The permittee shall collect and record the following information each day for emissions units K007 through K015 and K017, combined:
 - a. the total uncontrolled VOC usage rate for all coatings and cleanup materials employed, in tons [this is the summation of the total uncontrolled VOC usage rates (from section 1.f) for emissions units K007 through K015 and K017, combined]; and
 - b. the total calculated controlled VOC emission rate for all coatings and cleanup materials employed, in tons [this is the summation of the total calculated controlled VOC emission rates (from section 1.g) for emissions units K007 through K015 and K017, combined].
3. The permittee shall maintain and operate monitoring devices and a recorder that continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
4. The permittee shall operate and maintain a continuous monitor which measures the number of revolutions per hour for the fume concentrator when the emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. The monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record for each day the number of RPH, on a once/shift basis, when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain and operate continuous temperature monitors and recorders that measure and record the temperature at the following points when the emissions unit is in operation:
 - a. the temperature of the desorption air stream prior to the VOC fume concentrator wheel;
 - b. the temperature immediately upstream of the incinerator's catalyst bed; and
 - c. the temperature immediately downstream of the incinerator's catalyst bed.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the desorption air stream was less than 260 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit, that shall include the following information:
 - a. an identification of each day during which the total controlled VOC emission rate for this emissions unit exceeded the allowable daily emission limit of 3 lbs, and the actual daily VOC emission rate for each such day;
 - b. an identification of each day during which the total 365-day rolling VOC usage rate of the coatings and cleanup materials in emissions units K007 through K015 and K017, combined, exceeded the allowable usage restriction of 390.0 TPY, and the actual total 365-day rolling usage rate for emissions units K007 through K015 and K017, combined, for each such day;
 - c. an identification of all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average;
 - d. an identification of each shift during which the RPH was not within the range specified in Section A.III.4 of this permit;
 - e. an identification of all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel was less than 260 degrees Fahrenheit;
 - f. an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - g. an identification of all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that specify the total actual annual VOC emissions from this emissions unit and from emissions units K007 through K015 and K017, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year .
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
3 lbs/day VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
0.55 TPY VOC, including cleanup (for this emissions unit)

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirement specified in Section III.1. of this permit and shall be the summation of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
390.0 TPY VOC usage rate, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2 of this permit.
 - 1.d Emission Limitation -
39.0 TPY VOC, as a rolling, 365-day summation, for emissions units K007 through K015 and K017, combined, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections III.1. and III.2. of this permit.
 - 1.e Emission Limitations:
90% VOC overall (removal/destruction) efficiency for the fume concentrator and catalytic incinerator system

91.2% VOC removal efficiency for the fume concentrator wheel

98.5% VOC destruction efficiency for the catalytic incinerator

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section V.3. of this permit.
2. U.S. EPA Method 24 shall be used to determine the VOC contents for all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating and/or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency, the fume concentrator removal efficiency, and the catalytic incinerator destruction efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the overall, removal and destruction efficiencies for VOC.
 - i. the capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement; and
 - ii. the removal (carbon adsorber) and destruction (catalytic incinerator) efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control systems.
- The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while emissions units K007 through K015 and K017 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Maintenance Paint Booth (K018)
Activity Description: Maintenance Paint Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
maintenance paint booth, miscellaneous metal parts and non-metal parts	OAC rule 3745-31-05(A)(3) PTI # 08-2857	2.1 TPY organic compounds (OC), including emissions from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e) and 3745-21-07(G)(2).
	OAC rule 3745-21-09(U)(2)(e)	On any day when coating metal parts, less than or equal to 8 gallons of coatings usage per day for the coatings used for the metal parts
	OAC rule 3745-21-07(G)(2)	On any day when coating non-metal parts, 8 lbs/hour and 40 lbs/day of OC for the coatings and cleanup materials used for the non-metal parts.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit for the coatings and cleanup materials used for the metal and non-metal parts:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed;
 - c. the OC content, in pounds/gallon, of each coating and cleanup material employed;
 - d. the total volume, in gallons, of all of the coatings employed for miscellaneous metal parts;
 - e. the total OC emissions for all the coatings and cleanup materials employed [summation of (b x c) for all coatings and for all cleanup materials], in pounds;
 - f. for each day during which any material (coating or cleanup material) is employed for non-metal parts, the total OC emission rate for all the coatings and cleanup materials employed for such non-metal parts [summation of (b x c) for all coatings and for all cleanup materials], in pounds;
 - g. for each day during which any material (coating or cleanup material) is employed for non-metal parts, the total number of hours the emissions unit was in operation while coating such non-metal parts; and
 - h. for each day during which any material (coating or cleanup material) is employed for non-metal parts, the average hourly OC emission rate for all the coatings and cleanup materials employed for such non-metal parts, i.e., [(f)/(g)], in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limitation of 8 gallons (when coating miscellaneous metal parts). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which any material (coating or cleanup material) was employed for non-metal parts, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials used for the non-metal parts exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. For the days during which any material (coating or cleanup material) was employed for non-metal parts, an identification of each day during which the OC emissions from the coatings and cleanup materials used for the non-metal parts exceeded 40 pounds per day, and the actual OC emissions for each such day.

All of the quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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:
 - 1.a Emission Limitation -
2.1 TPY OC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. and shall be the summation of the daily OC emission rates for the calendar year.

V. Testing Requirements (continued)

- 1.b** Usage Restriction -
less than or equal to 8 gallons of coatings usage per day for the coatings used for the metal parts

Applicable Compliance Method -

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

- 1.c** Emission Limitations -
8 lbs/hour and 40 lbs/day of OC, for the coatings and cleanup materials used for the non-metal parts.

Applicable Compliance Method -

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: JR Mount Cell, Front and Rear (P523)
Activity Description: JR Mount Cell, Front and Rear

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
JR mount cell, front and rear, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a.
	OAC rule 3745-21-09 (U)(1)(d)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A). The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulates
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee only employs water as cleanup material in this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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:
 - 1.a Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.

V. Testing Requirements (continued)

- 1.d** Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

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

E = particulates emission rate (lbs/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

CE = control efficiency of the control equipment

- 1.e** Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -

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

- 2.** USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: RS Rear Mount Cell (P524)
Activity Description: RS Rear Mount Cell

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
RS rear mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulates
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee only employs water as cleanup material in this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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:
 - 1.a Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.

V. Testing Requirements (continued)

- 1.d** Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

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

E = particulates emission rate (lbs/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

CE = control efficiency of the control equipment

- 1.e** Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -

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

- 2.** USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: RS Front Mount Cell (P525)
Activity Description: RS Front Mount Cell

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
RS front mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulates
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee only employs water as cleanup material in this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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:
 - 1.a Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.

V. Testing Requirements (continued)

- 1.d** Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

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

E = particulates emission rate (lbs/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

CE = control efficiency of the control equipment

- 1.e** Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -

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

- 2.** USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: RS Left Hand Mount Cell (P526)
Activity Description: RS Left Hand Mount Cell

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
RS left hand mount cell, with filter	OAC rule 3745-31-05 (A)(3) PTI # 08-4051	10.8 lbs volatile organic compounds (VOC) /day, excluding cleanup; 1.97 TPY VOC
		2.5 lbs VOC/gallon of coating, excluding water and exempt solvents
		See A.I.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).
	OAC rule 3745-21-09 (U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	0.551 lb/hour particulates
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a The permittee only employs water as cleanup material in this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the filter system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, employed;
 - b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents);
 - c. the VOC content of each coating employed, in pounds per gallon;
 - d. the number of gallons of each coating employed; and
 - e. the total VOC emission rate for all the coatings employed, in pounds, i.e. [the summation of (c x d) for all coatings].
2. The permittee shall maintain daily records that document any time periods when the filter system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit that shall include an identification of each day during which the daily VOC emission rate for this emissions unit exceeded 10.8 lbs, and the actual daily VOC emission rate for each such day.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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:
 - 1.a Emission Limitation -
10.8 lbs VOC/day, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.
 - 1.b Emission Limitation -
1.97 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2000.
 - 1.c Emission Limitation -
2.5 lbs VOC/gallons of coating, excluding water and exempt solvents

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section III.1. of this permit.

V. Testing Requirements (continued)

- 1.d** Emission Limitation -
0.551 lb/hour particulates

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

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

E = particulates emission rate (lbs/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

CE = control efficiency of the control equipment

- 1.e** Emission Limitation -
20% opacity visible emissions, as a six-minute average

Applicable Compliance Method -

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

- 2.** USEPA Method 24 shall be used to determine the VOC contents for all the coatings. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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