



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 02-21701**

**Fac ID: 0204000441**

**DATE: 4/11/2006**

Plastpro Inc - Ashtabula Plant  
Jerry Hoback  
4737 Kister Ct  
Ashtabula, OH 44004

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NEDO

Eastgate Dev. & Trans. Study

NY

PA

**ASHTABULA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-21701 FOR AN AIR CONTAMINANT SOURCE FOR  
Plastpro Inc - Ashtabula Plant**

On 4/11/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Plastpro Inc - Ashtabula Plant**, located at **4737 Kister Court, Saybrook Township, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-21701:

**paint booth.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087  
[(330)425-9171]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 02-21701**

Application Number: 02-21701  
Facility ID: 0204000441  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Plastpro Inc - Ashtabula Plant  
Person to Contact: Jerry Hoback  
Address: 4737 Kister Ct  
Ashtabula, OH 44004

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4737 Kister Court  
Saybrook Township, Ohio**

Description of proposed emissions unit(s):  
**Paint booth.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Plastpro Inc - Ashtabula Plant  
PTI Application: 02-21701  
Issued: To be entered upon final issuance  
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0204000441

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

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

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

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

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

## **2. Scheduled Maintenance/Malfunction Reporting**

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

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

## **3. Risk Management Plans**

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

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

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**7. Fees**

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

**8. Federal and State Enforceability**

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

**9. Compliance Requirements**

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

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- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### **10. Permit-To-Operate Application**

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

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

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

#### **13. Permit-To-Install**

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

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this permit.**

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

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

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

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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

**5. Construction of New Sources(s)**

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

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

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

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

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

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**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
VOC	8.15

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**Facility ID: 0204000441**

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

**1. 40 CFR 63.7 (f) Use of an alternative test method**

- a. Until permission to use an alternative test method has been granted by the Administrator under this paragraph, the owner or operator of an affected source remains subject to the requirements of this section and the relevant standard.
- b. The owner or operator of an affected source required to do performance testing by a relevant standard may use an alternative test method from that specified in the standard provided that the owner or operator -
  - i. Notifies the Administrator of his or her intention to use an alternative test method not later than with the submittal of the site-specific test plan (if requested by the Administrator), or at least 60 days before the performance test is scheduled to begin, if a site-specific test plan is not submitted.
  - ii. Uses Method 301 in Appendix A of 40 CFR part 63 to validate the alternative test method; and
  - iii. Submits the results of the Method 301 validation process along with the notification of intention and the justification for not using the specified test method. The owner or operator may submit the information required in this section well in advance of the deadline specified in section A.1.b.ii of these terms and conditions to ensure a timely review by the Administrator, in order to meet the performance test date specified in this section or the relevant standard.
- c. The Administrator will determine whether the owner or operator's validation of the proposed alternative test method is adequate when the Administrator approves or disapproves the site-specific test plan required under paragraph (c) of §63.7. If the Administrator finds reasonable grounds to dispute the results obtained by the Method 301 validation process, the Administrator may require the use of a test method specified in a relevant standard.
- d. If the Administrator finds reasonable grounds to dispute the results obtained by an alternative test method for the purposes of demonstrating compliance with a

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relevant standard, the Administrator may require the use of test method specified in a relevant standard.

- e. If the owner or operator uses an alternative test method for an affected source during a required performance test, the owner or operator of such source shall continue to use the alternative test method for subsequent performance tests at that affected source until he or she receives approval from the Administrator to use another test method as allowed under §63.7 (f).
- f. neither the validation and approval process nor failure to validate an alternative test method shall abrogate the owner or operator's responsibility to comply with the requirements of the 40 CFR part 63.

**2. 40 CFR 63.9 (b) Initial notifications.**

- a. The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the Administrator in writing that the source is subject to the relevant standard. The notification, which shall be submitted no later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:
  - i. The name and address of the owner or operator;
  - ii. The address (i.e., physical location) of the affected source;
  - iii. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
  - iv. A brief description of the nature, size, design and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
  - v. A statement of whether the affected source is a major source or an area source.

**3. 40 CFR 63.9 (h) Notification of compliance status**

- a. Before a Title V permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this

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part, the owner or operator of such source shall submit to the Administrator a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list:

- i. The methods that were used to determine compliance;
  - ii. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
  - iii. The methods that will be used to determine continuing compliance, including a description of monitoring and reporting requirements and test methods;
  - iv. The methods that will be used to determine continuing compliance, including a description of monitoring and reporting requirements and test methods;
  - v. The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;
  - vi. If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);
  - vii. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
  - viii. A statement by the owner or operator of the affected new, reconstructed or existing source as to whether the source has complied with the relevant standard or other requirements.
- b. The notification must be sent before the close of business on the 60<sup>th</sup> day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). For example, the notification shall be sent before close of business on the 60<sup>th</sup> (or other required) day following completion of the initial performance test and again before the close of business

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on the 60th (or other required) day following the completion of any subsequent required performance test. If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with an opacity or visible emission standard under this part, the notification of compliance status shall be sent before close of business on the 30th day following the completion of opacity or visible emission observations. Notifications may be combined as long as the due date requirement for each notification is met.

- c After a Title V permit has been issued to the owner or operator of an affected source, the owner or operator of such source shall comply with all requirements for compliance status reports contained in the source's Title V permit, including reports required under this part. After a Title V permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this part, the owner or operator of such source shall submit the notification of compliance status to the appropriate permitting authority following completion of the relevant compliance demonstration activity specified in the relevant standard.
- d If an owner or operator of an affected source submits estimates or preliminary information in the application for approval of construction or reconstruction required in §63.5(d) in place of the actual emissions data or control efficiencies required in paragraphs (d)(1)(ii)(H) and (d)(2) of §63.5, the owner or operator shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section.

**4. 40 CFR 63.10 (a) Recordkeeping and reporting requirements**

If a owner or operator supervises one or more stationary sources affected by more than one standard established pursuant to section 112 of the Act, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State permitting authority) a common schedule on which periodic reports required for each source shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning one year after the latest compliance date for any relevant standard established pursuant to section 112 of the Act for any such affected source(s). Procedures governing the implementation of this provision are specified in §63.9 (i).

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

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None

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### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - A paint spray booth with two work stations for prime and finish of fiberglass reinforced plastic door components. Coatings are air dried.	OAC rule 3745-31-05 (A)(3)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.86 pounds per hour and 8.15 tons per year.
	OAC rule 3745-21-07 (G)(2)	Exempt. See section A.I.2.a of these terms and conditions.
	40 CFR 63.4490 (a) subpart PPPP	Limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.
		See section A.I.2.b of these terms and conditions.

##### 2. Additional Terms and Conditions

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5).
- 2.b In accordance with §63.4490 (c)(1) of 40 CFR, permittee choose to comply with 40 CFR part 63, subpart PPPP with only one of the emissions limits specified in section A.I.1 of these terms and conditions account for 90 percent or more of the surface coating activity at the facility (i.e., it is the predominant activity at the facility), then compliance with that emission limitation for all surface coating operations constitutes compliance with the other applicable emissions limitations. Permittee must use kg (lb) of solids used as a measure of relative surface coating activity over a representative period of operation. Permittee may estimate the relative mass of coating solids used from parameters other than

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coating consumption and mass solids content (e.g., design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and mass solids content must be approved by the Administrator of US EPA. Permittee may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator of US EPA. Permit must determine the predominant activity at this facility and submit the results of that determination with the initial notification required by section A.IV.3 of these terms and conditions. Additionally, permittee must determine the facility's predominant activity annually and include the determination in the next semi-annual compliance report required by section A.IV.4 of these terms and conditions.

- 2.c** In accordance with §63.4491 of 40 CFR, permittee must include all coatings (as defined in §63.4581 of 40 CFR), thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in section A.I.1 of these terms and conditions. To make this determination, permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in section A.I.1 of these terms and conditions, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. Permittee must meet all the requirements of sections A.V.2 - A.V.4 of these terms and conditions to demonstrate compliance with the applicable emission limit using this option. Permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. Permittee may use different compliance options for different coating operations, or at different times on the same coating operation. Permittee may employ different compliance options when different coatings are applied to the same part or when the same coating is applied to different parts. However, permittee may not use different compliance options at the same time on the same coating operation. If permittee switch between compliance options for any coating operation or group of coating operations, permittee must document this switch as required by section A.III.3 of these terms and conditions, and permittee must report it in the next semiannual compliance report required in section A.IV.4 of these terms and conditions.
- 2.d** In accordance with §63.4500 (a)(1) of 40 CFR, any coating operation(s) for

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which permittee use the compliant material option, as specified in section A.I.2.b of these terms and conditions, must be in compliance with the applicable emission limit in section A.I.a of these terms and conditions at all times.

- 2.e** In accordance with §63.4500 (b) of 40 CFR, permittee must always operate and maintain this emission unit, including all air pollution control and monitoring equipment permittee use for purposes of complying with these terms and conditions, according to the provisions in §63.6 (e)(1)(i).
- 2.f** The permittee shall use filters to control the particulate emissions generated from operating of this emissions unit.

## **II. Operational Restrictions**

None

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall keep the following records on all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5).
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The volume of each coating employed, defined as "V", in gallons .
  - c. The VOC content (excluding water and exempt solvents) of each coating, as applied, defined as "C<sub>VOC</sub>", in pounds per gallon.
  - d. The total operating hours of this emissions unit, defined as "OT", in hours per day.
  - e. The total VOC emissions from this emissions unit for the day, defined as "D<sub>VOC</sub>", in pounds per day. D<sub>VOC</sub> shall be calculated as follows:

$$D_{VOC} = \text{the sum, from } i = 1 \text{ to } i = n \text{ of } [(V)(C_{VOC})]_i$$

where,

i = subscript denoting an individual coating employed in this emissions unit; and

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n= the total number of coatings employed in this emissions unit.

- f. The average hourly VOC emissions from this emissions unit, defined as "H<sub>VOC</sub>", in pounds per hour, and shall be calculated as follows:

$$H_{VOC} = (D_{VOC})/(OT)$$

3. In accordance with §63.4530 of 40 CFR, the permittee must collect and keep records of the data and information specified in the following. Failure to collect and keep these records is a deviation from the 40 CFR Part 63, subpart PPPP.

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- a. A copy of each notification and report that was submitted to comply with 40 CFR part 63, subpart P, and the documentation supporting each notification and report. Permittee choose to use the predominant activity alternative under section A.I.2.b of these terms and conditions, permittee must keep records of the data and calculations used to determine the predominant activity.
- b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning materials, and the mass fraction of coating solids for each coating. If permittee conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, permittee must keep a copy of the complete test report. If information was provided by the manufacturer or supplier of the material that was based on testing, permittee must keep the summary sheet of results provided by the manufacturer or supplier. Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- c. For each compliance period, a record of the calculation of the organic HAP content for each coating, using the equation in section A.V.3.c of these terms and conditions
- d. A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If all coatings used at this emissions unit are compliant coatings, permittee may maintain purchase records for each material used rather than a record of the mass used.
- e. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- f. A record of the mass fraction of coating solids for each coating used during each compliance period.
- g. Permittee must keep records of the date, time and duration of each deviation.

In accordance with §63.4531 of 40 CFR, permittee must keep all above records in a form suitable and readily available for expeditious review, according to 40 CFR §63.10 (B)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Each record must be kept for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Permittee must keep each record on-site for at least two years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Permittee may keep the records off-site for the remaining three years.

4. The permittee shall properly install, operate, and maintain the filters while the emissions unit is in operation. The filters shall be installed, operated, and maintained in

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accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall check the filters on a weekly basis.

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1. The permittee shall submit deviation (excursion) reports which include the following information for this emissions unit:
  - a. An identification of each day during which any photochemically reactive materials were employed, and the actual amount, in pounds per day, of photochemically reactive materials employed.
  - b. An identification of each day during which the average hourly VOC emissions from this emissions unit exceeded 1.86 pounds per hour, and the actual average hourly VOC emissions for each such day.
2. All deviation (excursion) reports shall be submitted in accordance with the General Term and Conditions.
3. Initial notification.

In accordance with §63.4510 (b) of 40 CFR, permittee must submit the initial notification required by §63.9 (b) of 40 CFR no later than 120 days after initial startup.

4. Notification of compliance status

In accordance with §63.4510 (c) of 40 CFR, permittee must submit the notification of compliance status required by §63.9 (h) of 40 CFR not later than 30 calendar days following the end of the initial compliance period which specified in section A.V.2 of these terms and conditions. The notification of compliance status shall contain the information in the following:

- a. Company name and address;
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in section A.V.2 of these terms and conditions;
- d. Identification of the compliance option or options specified in section A.I.2.c of these terms and conditions that are used on each coating operation in this emissions unit during the initial compliance period;

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- e. Statement of whether or not this emissions unit achieved the emission limitations for the initial compliance period;
- f. If there was a deviation, the following information shall be included:

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- i. A description and statement of the cause of the deviation.
  - ii. If permittee failed to meet the applicable emission limit in section A.I of these terms and conditions, include all the calculations used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. The information provided by the materials' suppliers or manufacturer, or test reports are not required to be submitted.
- g. For each of the data items listed in sections A.IV.4.g.i to A.IV.4.g.iii of these terms and conditions that is required by the compliance option(s) used to demonstrate compliance with the emission limit, include an example of how the value was determined, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to sections A.V.3.a - A.V.3.c of these terms and conditions. Permittee do not need to submit copies of any test reports.
- i. Mass fraction of organic HAP for one coating, or one thinner and/or other additive, and for one cleaning material;
  - ii. Mass fraction of coating solids for one coating;
  - iii. Density for one coating, one thinner and/or other additive, and one cleaning material, except that if compliant material option was used, only the example coating density is required; and
- h. The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s), permittee must provide an example calculation of the organic HAP content for one coating, using equation in section A.V.3 c of these terms and conditions.
- i. The calculations and supporting information used to demonstrate that the single emission limit representing the predominant activity under section A.I.2.b of these terms and conditions.
5. Semiannual compliance reports

In accordance with §63.4520 of 40 CFR, permittee must submit semiannual compliance reports for each affected source according to the requirements in sections A.IV.5.a to A.IV.5.e of these terms and conditions. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air

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Act (CAA), as specified in section A.IV.5.b of these terms and conditions.

a. Dates.

Unless the Administrator of US EPA has approved or agreed to a different schedule for submission of reports under 40 CFR §63.10 (a), permittee must prepare and submit each semiannual compliance report according to the dates specified in sections A. IV.5.a. i through A.IV.5.iv of these terms and conditions. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in section A.V.2 of these terms and conditions that applies to this emissions unit and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
- ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- iii. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- iv. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in section A.IV.5.a.iii of these terms and conditions.

b. Inclusion with Title V report.

Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A). If an affected source submits a

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semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from the emission limitation under section A.I of these terms and condition, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

c. General requirements.

The semiannual compliance report must contain the information specified in section A.IV.5.c.i through A.IV.5.c.v of these terms and conditions, and the information specified in section A.IV.5.d - A.IV.5.e of these terms and conditions.

- i. Company name and address.
- ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the six months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- iv. Identification of the compliance option specified in section A.I.2.b of these terms and conditions that you used on each coating operation during the reporting period.
- v. Permittee choose to use predominant activity alternative for this emissions unit. The annual determination of predominant activity shall be included if it was not included in the previous semi-annual compliance report.

d. No deviations.

If there were no deviations from the emissions limitations in section A.I.a of these terms and conditions, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

e. Deviations: Compliant material option.

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If there was a deviation from the applicable organic HAP content requirements in section A.I of these terms and conditions, the semiannual compliance report must contain the following information:

- i. Identification of each coating used that deviated from the emission limit specified in section A.I of these terms and conditions, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
- ii. The calculation of the organic HAP content (using the equation in section A.V.3.c of these terms and conditions) for each coating identified in section A.IV.4.e.i of these terms and conditions. Permittee do not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
- iii. The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in section A.IV.5.e.i of these terms and conditions. Permittee do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
- iv. A statement of the cause of each deviation.

**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 method(s):
  - a. Emission Limitation:  
1.86 lb/hr of VOC emissions  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of these terms and condition.
  - b. Emission Limitation:  
8.15 tons/yr of VOC emissions  
  
Applicable Compliance Method:  
The tons per year limitations were developed by multiplying the pound per hour limitations by the maximum operating schedule of 8,760 hours per year, and

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dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

c. Emission Limitation:

0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be determined based upon the requirements in section A.V.3 of these terms and conditions.

2. In accordance with §63.4540 of 40 CFR, permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements in section A.V.3 of these terms and conditions. The initial compliance period begins on the date of initial startup of this emissions unit and ends on the last day of the 12th month following the date of initial startup of this emissions unit. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to section A.V.3 of these terms and conditions and supporting documentation showing that during the initial compliance period, no coating with an organic HAP content that exceeded the applicable emission limit in section A.I of these terms and conditions, and that no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to section A.V.3 of these terms and conditions.
3. In accordance with §63.4541 of 40 CFR, permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating options in the affected source. To demonstrate initial compliance using the compliant material operation, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the emission limit in section A.I. of these terms and conditions and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. To demonstrate compliance with a predominant activity as be chosen by permittee, permittee must demonstrate that all coating operations included in the predominant activity determination comply with that limit. Permittee must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. Permittee does not need to redetermine the organic HAP content of coatings, thinners and/or additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if permittee have documentation showing that permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which permittee use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

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- a. Determine the mass fraction of organic HAP for each material used.

Permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in sections A.V.3.a.i through A.V.3.a.v of these terms and conditions:

- i. Method 311 (appendix A to 40 CFR)

Permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in sections A.V.3.a.i.(1) and A.V.3.a.i.(2) of these terms and conditions when performing a Method 311 test.

- (1) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA) - defined carcinogens as specified in 29 CFR 1910.1200 (d)(4) and at 1.0 percent by mass or more for other compounds. Express the mass fraction of each organic HAP permittee count as a value truncated to four places after the decimal point (e.g., 0.3791).
- (2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

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ii. Method 24 (appendix A to 40 CFR Part 60)

For coatings, permittee may use Method 24 to determine the mass fraction of non aqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, permittee may use the alternative method contained in appendix A to 40 CFR Part 63, subpart PPPP, rather than Method 24. Permittee may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to 40 CFR Part 63, subpart PPPP, as a substitute for the mass fraction of organic HAP.

iii. Alternative Method.

Permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator of US EPA has approved it. Permittee must follow the procedure in §63.7 (f) to submit an alternative test method for approval.

iv. Information from the supplier or manufacturer of the material.

Permittee may rely on information other than that generated by the test methods specified in sections A. V.3.a.i through A.V.3.a.iii of these terms and conditions, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA - defined carcinogens as specified in 29 CFR 1910.1200 (d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, permittee do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to sections A. V.3.a.i through A.V.3.a.iii of these terms and conditions, then the test method results will take precedence unless, after consultation permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

v. Solvent blends

Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table I

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or Table II in section A.VI of these terms and conditions. If permittee use the tables, permittee must use the values in Table I for all solvent blends that match Table I entries according to the instructions for Table I, and permittee may use Table II only if the solvent blends in the materials permittee use do not match any of the solvent blends in Table I and permittee know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table I or Table II in section A.VI of these terms and conditions, the Method 311 results will take precedence unless, after consultation permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- b. Determine the mass fraction of coating solids for each coating.

Permittee must determine the mass fraction of coating solids [kg (lb) of coating solids per kg (lb) of coating] for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, specified in sections A.V.3.b.i through A.V.3.b.iii of these terms and conditions.

- i. Method 24 (appendix A to 40 CFR part 60)

Use Method 24 for determining the mass fraction of coating solids. For reactive adhesives in which some of the liquid fraction reacts to form solids, permittee may use the alternative method contain in appendix A to 40 CFR part 63 subpart PPPP, rather than Method 24, to determine the mass fraction of coating solids.

- ii. Alternative Method.

Permittee may use an alternative test method for determining the solids content of each coating once the Administrator of US EPA has approved it. Permittee must follow the procedure in §63.7 (f) to submit an alternative test method for approval.

- iii. Information from the supplier or manufacturer of the material.

Permittee may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation permittee demonstrate to the

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satisfaction of the enforcement agency that the formulation data are correct.

- c. Calculate the organic HAP content of each coating.

Calculate the organic HAP content, kg (lb) organic HAP emitted per kg (lb) coating solids used, of each coating used during the compliance period using the following equation:

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$$H_c = (W_c)/(S_c)$$

Where,

$H_c$  = Organic HAP content of the coating, kg (lb) of organic HAP emitted per kg (lb) coating solids used.

$W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to section A.V.3.a of these terms and conditions.

$S_c$  = Mass fraction of coating solids, kg coating solids per kg coating, determined according to section A.V.3.b of these terms and conditions.

d. Compliance demonstration

The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in section A.I. of these terms and conditions; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to section A.V.3.a of these terms and conditions. Permittee must keep all records required by section A.III.3 of these terms and conditions. As part of the notification of compliance status required in section A.IV.3 of these terms and conditions, permittee must identify the coating operation(s) for which permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in section A.I. of these terms and conditions, and permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in section A.V.3.a of these terms and conditions.

4 Demonstration of continuous compliance with the emission limitations, in accordance with §63.4542 of 40 CFR.

- a. For each compliance period to demonstrate continuous compliance, permittee must use no coating for which the organic HAP content (determined using the equation in section A.V.3.c of these terms and conditions) exceeds the applicable emission limit in section A.I of these terms and conditions, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to section A.V.3.a of these terms and conditions. A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in section A.V.2 of these terms and conditions, is the end of a compliance period consisting of that month and the preceding 11

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months.

- b. If permittee choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in section A.V.4.a of these terms and conditions is a deviation from the emission limitations that must be reported as specified in sections A.IV.3 and A.IV.4 of these terms and conditions.
- c. As part of each semiannual compliance report required by section A.IV.4 of these terms and conditions, permittee must identify the coating operation(s) for which permittee used the compliant material option. If there were no deviations from the emissions limit in section A.I of these terms and conditions, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because permittee used no coatings for which the organic HAP content exceeded the emission limit in section A.I of these terms and conditions, and permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to section A.V.3.a of these terms and conditions.
- d. Permittee must maintain records as specified in section A.III.3 of these terms and conditions.

## VI. Miscellaneous Requirements

1. Permittee may use the mass fraction values in the following table I for solvent blends for which permittee do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from the table in section A. VI..2 of these terms and conditions if neither the name or CAS number match.

**Table I Default Organic HAP Mass Fraction For Solvents and Solvent Blends**

Solvent/solvent blend	CAS No.	Average Organic HAP Mass Fraction	Typical Organic HAP, percent by mass
1. Toluene	108-88-3	1.0	Toluene.

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2. Xylene (s)	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane	110-54-3	0.5	n-hexane.
4. n-Hexane	110-54-3	1.0	n-hexane.
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140	----	0	None
7. Aromatic 100	----	0.02	1% xylene, 1% cumene.
8. Aromatic 150	----	0.09	Naphthalene.
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit	64742-82-1	0	None.
15. Mineral spirits	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene.
18. Stoddard solvent	8052-41-3	0.01	Xylenes.
19. Supper high-flash naphtha	64742-95-6	0.05	Xylenes.
20. Varsol® solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

2. Permittee may use the mass fraction values in the following table II for solvent blends for which permit do not have test data or manufacturer's formulation data.

**Table II Default Organic HAP Mass Fraction For Petroleum Solvent Group<sup>a</sup>**

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic <sup>b</sup>	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic <sup>c</sup>	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene

<sup>a</sup> Use this table only if the solvent blend does not match any of the solvent blends in Table I of section A.VI.1 of these terms and conditions by either solvent blend name or CAS number and permittee only know whether the blend is aliphatic or aromatic.

<sup>b</sup> Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

<sup>c</sup> Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

**Plastpro Inc - Ashtabula Plant**  
**PTI Application: 02 21701**  
**Issue**

**Facility ID: 0204000441**

Emissions Unit ID: R001

**Plasti****PTI A**

Emissions Unit ID: R001

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - A paint spray booth with 2 work stations for prime and finish of fiberglass reinforced plastic door components. Coatings are air dried.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Plasti**

**PTI A**

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxics Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

**Plasti****PTI A**

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.