



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/2/2011

Certified Mail

Sue Ahrmann
YUSA CORPORATION
151 Jamison Rd. SW
Washington C.H., OH 43160

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0124010098
Permit Number: P0107944
Permit Type: Initial Installation
County: Fayette

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Record Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Proposed installation of 1 new resin line (K070) and 1 new primer/adhesive application process (P305). EU K070 consists of an Isopropyl alcohol pre-wash, an electric dryer, coating application to rubber parts and then another electric dryer. There are no particulate or organic compound controls associated with this EU. EU P305 consists of the application of a primer to metal parts, and electric dryer, coating application to metal parts and then another electric dryer. The spray application for EU P305 will take place within a permanent total enclosure that vents all VOC emissions to a regenerative thermal oxidizer. Particulate emissions are controlled through the use of a dry filtration system. EU P305 is considered as part of the affected source with respect to 40 CFR Part 63, subpart M for Surface Coating of Miscellaneous Metal Parts. The requirement to operate the RTO is necessary to avoid Major NSR for VOC and may be necessary to demonstrate compliance with the applicable requirements of subpart M (the facility has chosen the “emissions rate with add-on controls” option for demonstrating compliance with the M subpart and may use the control efficiency of the RTO if all of the subpart requirements are met).

3. Facility Emissions and Attainment Status:

YUSA Corporation is a Title V facility located within Fayette County. Fayette County is designated as “Attainment” for all criteria pollutants regulated under the CAA. The installation of these two coating operations represents an increase in potential emissions for the facility of 12.71 TPY VOC and 0.86 TPY PE. The following table identifies the potential particulate and VOC emissions before and after controls:

Major NSR Applicability

	Uncontrolled (tpy)		Controlled (tpy)	
	VOC	PE	VOC	PE
K070	11.55	0.61	NA	NA
P305	38.55	4.90	1.16	0.25

Federally enforceable limitations on the potential-to-emit for VOCs will be established by requiring the use of a permanent total enclosure and RTO for EU P305. As identified in the table above, the limitations on potential to emit for VOCs is not necessary for this project, but are being included for future PSD considerations. In addition to the synthetic minor limitations established for VOC emissions from EU P305, potential emissions of PE for EU P305 are limited by OAC rule 3745-17-11(C) requirements.

Emissions from the combustion of natural gas in the RTO were not considered because the RTO burner qualifies for the exemption specified in OAC rule 3745-31-03(A)(1)(a). The RTO utilizes an 8.5 MMBtu burner. As identified in the table above, the uncontrolled potential emissions for particulate from both EUs and the controlled VOC emissions from EU P305 are below 10 tpy. In accordance with agency guidance, pre-SB265 BAT limitations have been established for these pollutants and will “sunset” if/when the USEPA approves the SIP revision to OAC rule 3745-31-05. BAT limitations have been established for the VOC emissions from EU K070 in accordance with the December 2010 BAT guidance.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
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Facility ID: 0124010098

4. Source Emissions:

EU K070 Emissions:

VOC: IPA = 0.13 gal/hr * 6.56 lbs/gal VOC = 0.85 lb/hr = 3.72 tpy
C6225 = 0.13 gal/hr * 6.03 lbs/gal VOC = 0.78 lb/hr = 3.42 tpy
Toluene = 0.07 gal/hr * 7.26 lbs/gal = 0.51 lb/hr = 2.23 tpy

Clean-up(toluene) = 600 gal/yr * 7.26 lbs/gal = 4356 lbs/yr = 2.18 tpy

Total uncontrolled VOC = 11.55 tpy

PE: C6225 = 0.13 gal/hr * 13.20 lbs/gal * 0.1622%vol * 0.50(transfer) = 0.14 lb/hr = 0.61 tpy

EU K070 is subject to the following rules:

OAC rule 3745-31-05(A)(3), as effective 11/30/2001 – Short term and annual BAT limitations were established for PE in accordance with pre-SB265 guidance.

OAC rule 3745-31-05(A)(3), as effective 12/01/2006 – Language has been included that identifies that the BAT limitations established for PE will “sunset” if/when the USEPA approves the SIP revision to OAC rule 3745-31-05.

ORC 3704.03(T) – In accordance with the December 2010 BAT guidance, a rolling, 12-month BAT limitation was established for OC emissions because the potential to emit for OC is greater than 10 tpy.

OAC rule 3745-21-07(G)(2) – The emissions unit is subject to the 8 lb/hr and 40 lb/day limitations identified by this rule. Language has been included identifying that the rule will no longer apply if/when the USEPA approves the SIP revision to OAC rule 3745-21-07. The potential to emit is less than 8 lbs/hr. Language has been included that requires the permittee to keep records to demonstrate compliance with the 40 lb/day limitation until the SIP revision is approved.

OAC rule 3745-17-11(A)(1)(i) – This surface coating process is exempt from the requirements of OAC rule 3745-17-11(C) because the process uses less than five gallons per day. Monitoring, recordkeeping and reporting requirements have been included to ensure that the process remains qualified for the exemption.

ORC 3704.03(F)(3)(c) – Option A was performed and determined that the Predicted 1-Hour Maximum Ground-Level Concentration (26.64 ug/m³) is less than 80% of the MAGLC (1,794 ug/m³)

EU P305 Emissions:

VOC: C205 = 0.30 gal/hr * 5.85 lbs/gal VOC = 1.76 lbs/hr = 7.71 tpy
MIBK = 0.06 gal/hr * 6.69 lbs/gal VOC = 0.40 lb/hr = 1.75 tpy
C6225 = 0.72 gal/hr * 6.03 lbs/gal VOC = 4.34 lbs/hr = 19.02 tpy
Toluene = 0.29 gal/hr * 7.26 lbs/gal VOC = 2.11 lbs/hr = 9.24 tpy



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Clean-up(MIBK) = 120 gal/yr * 6.69 lbs/gal = 802.8 lbs/yr = 0.40 tpy
 Clean-up(toluene) = 120 gal/yr * 7.26 lbs/gal = 871.2 lbs/yr = 0.44 tpy

Total uncontrolled VOC = 38.56 tpy
 Total controlled VOC (97%) = 1.16 tpy

PE: C205 = 0.30 gal/hr * 14.77 lbs/gal * 0.1365%vol * 0.50(transfer) * 0.05(control) = 0.16 lbs/hr = 0.07 tpy

C6225 = 0.72 gal/hr * 13.20 lbs/gal * 0.1622%vol * 0.50(transfer) * 0.05(control) = 0.04 bs/hr = 0.18 tpy

EU P305 is subject to the following rules:

OAC rule 3745-31-05(A)(3), as effective 11/30/2001 – Short term and annual BAT limitations were established for PE in accordance with pre-SB265 guidance. A short term VOC limitation was also established in accordance with pre-SB265 guidance. An annual VOC BAT limitation was not necessary due to the rolling, 12-month limitation established under OAC rule 3745-31-05(D).

OAC rule 3745-31-05(A)(3), as effective 12/01/2006 – Language has been included that identifies that the BAT limitations established for PE and VOC emissions will “sunset” if/when the USEPA approves the SIP revision to OAC rule 3745-31-05.

OAC rule 3745-31-05(D) – Synthetic minor limitations have been established for the purpose of limiting VOC emissions for future PSD consideration. The synthetic minor limitations include only the rolling, 12-month limitations and the requirement to employ control equipment for EU P305. It was not necessary to develop any specific operational restrictions for synthetic minor purposes (other than the control equipment requirements). Monitoring, recordkeeping, reporting and testing terms have been included to ensure compliance with the synthetic minor limitations.

OAC rule 3745-21-09(U)(1)(i) – A controlled coating limitation of 5.1 lbs VOC per gallon of coating solids has been established in accordance with OAC rule 3745-21-09(U)(1). The following tables identify the controlled hourly VOC emissions from EU P305 and the hourly solids consumed used to determine compliance with OAC 3745-21-09(U)(1)(i):

	Coatings VOC rate (lb/hr)		Thinners VOC rate (lb/hr)		Combined VOC rate (lb/hr)	Control Efficiency	Controlled VOC(lb/hr)
	C205	C6225	MIBK	Toluene			
P305	1.76	4.34	0.40	2.11	8.61	97%	0.26



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	Application Rate (gal/hr)		Solids Content (% volume)		Total solids (gal/hr)	Controlled VOC(lb/hr)	Max VOC/gal coating solids
	C205	C6225	C205	C6225			
P305	.30	0.72	0.1365	0.1622	0.16	0.26	1.63

Monitoring, recordkeeping, reporting and testing terms have been included to ensure compliance with the controlled coating limitation.

OAC rule 3745-17-11(C) – Standard Terms and Conditions Library terms have been used to establish operational restrictions, monitoring/recordkeeping and reporting requirements associated with the dry particulate filtration system.

40 CFR Part 63, subparts M and A – EU P305 is considered as part of the affected source with respect to 40 CFR Part 63, subpart M for Surface Coating of Miscellaneous Metal Parts.

ORC 3704.03(F)(#)(c) – Option A was not necessary because the total controlled Air Toxic emissions from EU P305 is less than 1 TPY.

5. Conclusion:

The terms and conditions contained within PTI P0107944 are sufficient to ensure compliance with all state and federal regulations.

6. Please provide additional notes or comments as necessary:
 None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC/OC	12.71
PE	0.86

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
YUSA CORPORATION

Issue Date: 6/2/2011

Permit Number: P0107944

Permit Type: Initial Installation

Permit Description: Installation of a new resin line and a new primer/adhesive coating operation.

Facility ID: 0124010098

Facility Location: YUSA CORPORATION

151 Jamison Rd. SW,

Washington Court House, OH 43160

Facility Description: Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Benjamin Halton at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
YUSA CORPORATION**

Facility ID:	0124010098
Permit Number:	P0107944
Permit Type:	Initial Installation
Issued:	6/2/2011
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
YUSA CORPORATION

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Authorization

Facility ID: 0124010098
Facility Description: Motor vehicle parts and accessories
Application Number(s): A0041540, A0041587
Permit Number: P0107944
Permit Description: Installation of a new resin line and a new primer/adhesive coating operation.
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/2/2011
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

YUSA CORPORATION
151 Jamison Rd. SW
Washington Court House, OH 43160

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107944

Permit Description: Installation of a new resin line and a new primer/adhesive coating operation.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K070
Company Equipment ID:	Resin Line #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P305
Company Equipment ID:	5100-OUTP-04
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) 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 Ohio EPA DAPC, Central District Office. The written 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 A.15. below if no deviations occurred during the quarter.
 - (3) 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 Ohio EPA DAPC, Central District Office 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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).

6. Compliance Requirements

- a) 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.
- b) 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.



- c) 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:
 - (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Ohio EPA DAPC, Central District Office.
- 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 Ohio EPA DAPC, Central District Office. 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P305, 5100-OUTP-04

Operations, Property and/or Equipment Description:

chain on edge machine (adhesive/primer application), vented to a regenerative thermal oxidizer (RTO)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions shall not exceed 0.26 pound per hour (lb/hr), excluding cleanup materials</p> <p>Particulate emissions (PE) shall not exceed 0.056 lb/hr and 0.25 ton per year (TPY).</p> <p>See b)(2)a., b)(2)b., and b)(2)c.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	<p>VOC emissions shall not exceed 1.16 tons per rolling, 12-month period, including cleanup materials.</p> <p>VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%.</p> <p>See c)(1)</p>
d.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	ORC 3704.03(F)(3)(c)	See d)(11)



Table with 3 columns: Reference, Description, and Cross-Reference. Row g: 40 CFR Part 63, Subpart MMMM; See b)(2)e. Row h: 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16); See b)(2)f.

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limitations was established to reflect the potential to emit for this emissions unit taking into consideration the capture and control requirements established under OAC rule 3745-31-05(D) for the control of VOC emissions.
b. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the requirements established under OAC rule 3745-17-11(C) for the control of particulate emissions.
c. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.
d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:
i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than 10 TPY; and
ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the controlled potential to emit for VOC is less than 10 TPY taking into consideration the federally enforceable limitations on the potential to emit established under OAC rule 3745-31-05(D).
e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

- i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart M, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

- f. Table 2 to subpart M of 40 CFR Part 63 - "Applicability of General Provisions to Subpart M of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.
- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR Part 63.3880-3981).
- (5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:

- a. the name and identification number for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total monthly VOC emissions, in tons; and
 - e. the rolling, 12-month VOC emissions, in tons.
- (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 used;
 - b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and
 - d. The calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Central District Office upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

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- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (9) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (10) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not

constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (11) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
 - (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981).
 - (13) The permittee shall comply with the applicable monitoring and recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16).
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
 - ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;
 - iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - iv. each incident of deviation described in "ii" or "iii" (above) where a prompt investigation was not conducted;

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- v. each incident of deviation described in [ii] or "iii" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;
- vi. each incident of deviation described in [ii] or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and,
- vii. each rolling, 12-month period during which the total VOC emissions from this emissions unit exceeded 1.16 tons.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (3) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Central District Office).
 - (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR Part 63.3880-3981).
 - (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16).
- f) Testing Requirements
- (1) Compliance with the emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.26 lb/hr, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

$$\text{VOC} = (\text{U} \cdot \text{Vc}) \cdot (1 - \text{CE})$$

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

V_c = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.056 lb/hr and 0.25 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

$$PE = (U \cdot D \cdot S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 1.16 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

$$E = [\text{VOC}/(\text{M} \cdot \text{S})] \cdot [1 - \text{CE}]$$

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart M. M. M. M.

(2) 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 within 3 months after start-up;
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;
 - e. Not later than 30 days prior to the proposed test date(s), the permittee 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);
 - f. 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 ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
 - g. 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.
- (3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The 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.)
 - (4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - (5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981).
 - (6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16).

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- g) Miscellaneous Requirements
 - (1) None.



2. K070, Resin Line #5

Operations, Property and/or Equipment Description:

Resin Line #5 Coating Machine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3) through d)(6) and e)(2)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Particulate emissions (PE) shall not exceed 0.14 pound per hour (lb/hr) and 0.61 ton per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c.
c.	ORC 3704.03(T)	Organic compound (OC) emissions shall not exceed 11.55 tons per rolling, 12-month period, including emissions from pre-wash, coating, and cleanup material usage.
d.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day including emissions from pre-wash, coating, and cleanup material usage. See b)(2)d. and b)(2)e.
e.	OAC rule 3745-17-11(A)(1)(i)	See b)(2)f.
f.	ORC 3704.03(F)(3)(c)	See d)(3) through d)(6) and e)(2)c.

(2) Additional Terms and Conditions

a. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- b. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.
 - c. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than 10 TPY.
 - d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision:
 - i. b)(1)d., d)(1), e)(2)a. and f)(1)c.
 - e. The hourly limitation established by this rule is greater than the potential to emit for this emissions unit. It is not necessary to establish monitoring, recordkeeping, reporting or testing requirements to demonstrate compliance with this limitation. Monitoring, recordkeeping, reporting and testing requirements have been established in the following terms and conditions for the purpose of demonstrating compliance with the daily limitation until the U.S. EPA approves the revision to OAC rule 3745-21-07.
 - f. In accordance with OAC rule 3745-17-11(A)(1)(i), this surface coating process is exempt from the emissions limitations identified in OAC rule 3745-17-11(A) because the surface coating process uses less than five gallons per day.
- c) Operational Restrictions
- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for the coating operation until the U.S. EPA approves the revision to OAC rule 3745-21-07:
 - a. the company identification for each coating, photochemically reactive cleanup material, and pre-wash material employed;
 - b. the number of gallons of each coating, photochemically reactive cleanup material, and pre-wash material employed;
 - c. the organic compound content of each coating, photochemically reactive cleanup material, and pre-wash material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings, photochemically reactive cleanup materials, and pre-wash materials, in pounds per day;

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

- (2) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating, cleanup material, and pre-wash material employed;
 - b. the number of gallons of each coating, cleanup material, and pre-wash material employed;
 - c. the organic compound content of each coating, cleanup material, and pre-wash material, in pounds per gallon;
 - d. the total monthly OC emissions from all coating, cleanup material, and pre-wash material used; and
 - e. the rolling, 12-month OC emissions from the emissions unit.
- (3) The PTI application for this/these emissions unit(s), K070, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

Effective Date: To be entered upon final issuance

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

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

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

Toxic Contaminant: Toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (lbs/hr): 2.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 26.64MAGLC (ug/m³): 1,794

The permittee, has demonstrated that emissions of Toluene, from emissions unit(s) K070, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. an identification for each day during which the OC emission rate from the emissions unit exceeded 40 pounds per day, and the actual OC emissions rate for each such day (until the U.S. EPA approves the revision to OAC rule 3745-21-07);
 - b. any daily record showing that the number of gallons of coating used by the emissions unit exceeded 5 gallons; and
 - c. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- (3) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Central District Office).
- f) Testing Requirements
- (1) None.
 - a. Emissions Limitation:

PE shall not exceed 0.14 lb/hr and 0.61 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

$$PE = (U * D * S) * (1 - TE)$$

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emissions Limitation:

OC emissions shall not exceed 11.55 tons per rolling, 12-month period, including emissions from pre-wash, coating, and cleanup material usage.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

c. Emissions Limitation:

OC emissions shall not exceed 8 pounds per hour and 40 pounds per day including emissions from pre-wash, coating, and cleanup material usage.

Applicable Compliance Method:

Compliance with the 40 lbs/day limitation shall be based upon the record keeping specified in d)(1).

Compliance with the 8 lbs/hr limitation shall be based upon the following equation:

$$OC = (U * V_c) * (1 - CE)$$

where:

VOC = maximum VOC emissions (lb/hr)



U = maximum coating usage rate (gal/hr)

V_c = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple VOC contents.

g) Miscellaneous Requirements

(1) None.