

Green Manufacturing Inc.
Premise # 0387020162
PTI # 03-13008

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

This Permit to Install (PTI) is to modify PTI #03-10703 to allow for increased usage of cleanup materials in emissions unit K001 at Green Manufacturing Inc. in Bowling Green, Ohio. All limits in this permit are based on the emissions unit's potential-to-emit.

A. Applicable Emissions Limitations and/or Control Requirements

1. No additional emissions limitations and/or control requirements than those specified in the Air Emissions Summary.

B. Operational Restrictions

1. This permit allows for the use of the coating and cleanup materials specified by the permittee in the application for PTI number 03-13008. In conjunction with the best available technology requirements of OAC 3745-31-05, the OC emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on the coating and cleanup material formulation data and the design parameters of the emission unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for toluene on the Screen3 model and a comparison of the predicted 1-hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following summarized the results of the modeling for toluene:

K001

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lb/hr): 0.375 (*)

Predicted 1-Hour Max. Concentration (mg/m³): 15.02

MAGLC (mg/m³): 4.48

- * Note: These levels represent total emissions of cleanup materials and not the incremental increases resulting from the modifications. Emissions from the coating operations were not

increased as a result of this modification, therefore, modeling of the coating was not performed.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 03-13008 and the operating permit:

(a) any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

(b) any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

(c) any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

(d) any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];

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

3. The permittee shall use only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U)(1)(d) on an "as applied" basis in emissions units K001.
4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
5. All coatings employed in this emissions unit shall not

be dried at temperatures exceeding 250 degrees Fahrenheit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:

- (a) The name and identification number of each coating, as applied.

- (b) The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record monthly the following information for emissions unit K001:

- (a) The name and identification of each coating/cleanup material employed.

- (b) The VOC content of each cleanup material, in pounds per gallon.

- (c) The VOC content of each coating material, in pounds per gallon, as applied.

- (d) The number of gallons of each cleanup material employed.

- (e) The number of gallons of each coating employed.

- (f) The total VOC emission rate from all coatings employed, in pounds or tons per month.

- (g) The total VOC emission rate from all cleanup materials employed, in pounds or tons per month.

- (h) The total VOC emission rate from all coatings and cleanup materials employed, in pounds or tons per year, for the calendar year-to-date.

3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K001. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Ohio EPA Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northwest District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly written reports for emissions unit K001 of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that

quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements/Compliance Method Determinations

1. Compliance with the emission limitations in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations:

- 3.5 lbs VOC/hour from all coating materials
 - 1500 lbs VOC/month from all cleanup materials

- Applicable Compliance Method:

- These hourly VOC limits for coatings and monthly VOC limits for cleanup operations are based on the emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

- b. Emission Limitations:

- 24.33 TPY from all coating and cleanup materials

- Applicable Compliance Method:

- The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

- 3.5 lbs VOC/gallon excluding water and exempt solvents.

- Applicable Compliance Method:

- The record keeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

- Any determination of the VOC content*, solids content, or density of a coating and/or cleanup material shall be based on the coating/cleanup material as applied,

including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coating/cleanup material by formulation data supplied by the manufacturer of the coating/cleanup material, or from data determined by an analysis of each coating/cleanup material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of the coating/cleanup material by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of VOC per gallon.

3. Emission Limitation:

0.10 lb/hr particulate emissions, 0.44 ton/yr

Applicable Compliance Method:

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{particulate matter emissions rate (lbs/hr)}$

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR 60.453)

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

Annual emissions may be calculated based on multiplying E by the annual operating schedule for the emissions unit.

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to 40 CFR Part 60 Appendix A, Method 5.

4. Emission Limitation:

0% opacity as a six minute average

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 9

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

1. The preceding requirements supersede all the requirements contained in the following Permits-to-Install: 03-10703.