State of Ohio Environmental Protection Agency

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

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

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

RE: DRAFT PERMIT TO INSTALL
MEDINA COUNTY
Application No: 16-01940

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 7/18/00

Plasti-Kote Co
Allen Stegman
701 S Shiloh Rd
Garland, TX 75042

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 of 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 **$1000** 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.

Very truly yours,

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

CC: USEPA **ARAQMD**

DRAFT PERMIT TO INSTALL 16-01940

Application Number:	16-01940
APS Premise Number:	1652050060
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Plasti-Kote Co
Person to Contact:	Allen Stegman
Address:	701 S Shiloh Rd Garland, TX 75042

Location of proposed air contaminant source(s) [emissions unit(s)]:
1000 Lake Rd
Medina, Ohio

Description of proposed emissions unit(s):
Modification to the PTI emission limitations for spray paint booths R003, R004, and R006 and the addition of a new spray paint booth K002.

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

Part I - GENERAL TERMS AND CONDITIONS

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 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. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

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 of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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.

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 To Install 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of 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.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. 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.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

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

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

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

Pollutant	Tons Per Year
PM	9.64
VOC	46.46
Acetone	136.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3.	OAC rule 3745-31-05(A)(3)	117.0 pounds of volatile organic compounds (VOC) per day for coatings 252.0 pounds of acetone per day for coatings 50.0 tons of acetone per year for coatings and cleanup materials 2.41 tons of PM per year
	OAC rule 3745-31-05(D)	The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. 6.1 tons of volatile organic compounds (VOC) per rolling 12-month period for coatings See A.II.1 below.
	OAC rule 3745-17-07(A)	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 pound of particulate matter (PM) per hour See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. The VOC content of the car color coating and the red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively. The usage limits result in a 6.1 tons of VOC per year emission limitation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Car Color Coating Usage	Maximum Allowable Cumulative Red Spot Primer Coating Usage
1	428.6 gallons	507.1 gallons
1-2	857.1 gallons	1014.3 gallons
1-3	1285.7 gallons	1521.4 gallons
1-4	1714.3 gallons	2028.6 gallons
1-5	2142.9 gallons	2535.7 gallons
1-6	2571.4 gallons	3042.9 gallons
1-7	3000.0 gallons	3550.0 gallons
1-8	3000.0 gallons	3550.0 gallons
1-9	3000.0 gallons	3550.0 gallons
1-10	3000.0 gallons	3550.0 gallons
1-11	3000.0 gallons	3550.0 gallons
1-12	3000.0 gallons	3550.0 gallons

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The permittee shall only employ cleanup material that does not contain VOC as defined in OAC rule 3745-21-01(B)(6).

3. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain records of the following information for the coating line:

   a. the MSDS sheets for each coating and cleanup material currently employed;

   b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and,

   c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.

2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:

   a. the company identification for each coating and cleanup material employed;

   b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;

   c. the number of gallons of each coating and photochemically reactive cleanup material employed;

   d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

   e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

   f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,

   g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for this emissions unit:

   a. the name and identification of each cleanup material employed; and,

   b. documentation as to whether or not the cleanup material contains VOC.

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

   a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, then divided by 2000); and,

   b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the VOC emission figures.

   Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative VOC emissions for each calendar month.

5. The permittee shall maintain monthly records of the following information:

   a. the car color coating usage and the red spot primer coating usage for each month; and,

   b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the coating usage figures.

   Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative coating usage for each calendar month.

6. The permittee shall collect and record the following information each day for the coating line:

   a. the name and identification number of each coating employed;

   b. the VOC content of each coating, in pounds per gallon;

   c. the acetone content of each coating, in pounds per gallon;

   d. the volume, in gallons, of each coating employed;

   e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and,

   f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

7. The permittee shall collect and record the following information each month for the coating line:

   a. the name and identification number of each cleanup material employed;

b. the acetone content of each cleanup material, in pounds per gallon;

c. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions in Section A.III.6.f above for each month, then divided by 2000);

d. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000); and,

e. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (c) plus (d)).

8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month car color coating usage and red spot primer coating usage limitations and, for the first 12 calendar months of operation following the issuance of this permit to install, all exceedances of the maximum allowable cumulative coating usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing "VOC" (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating which exceeds the VOC contents specified in Section A.II.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter 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 Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

7. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.

8. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the acetone emissions exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.

9. The permittee shall also submit annual reports which specify the total acetone and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

8.0 pounds of organic compounds (OC) per hour

40 pounds of OC per day

Applicable Compliance Method

Daily record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating photochemically reactive cleanup material, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

c. Emission Limitation

0.551 pound of PM per hour

Applicable Compliance Method:

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

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation

6.1 tons of VOC per rolling 12-month period for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Sections A.III.4 and A.III.6 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

e. Emission Limitation

117.0 pounds of VOC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.6 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tons of PM per year

Applicable Compliance Method:

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

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

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 = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation

252.0 pounds of acetone per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the acetone content of each coating as required in Section A.III.6 above. Formulation data shall be used to determine the acetone content for each coating.

h. Emission Limitation

50.0 tons of acetone per year for coatings and cleanup materials

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the acetone content of each coating and cleanup material as required in Sections A.III.6 and A.III.7 above. Formulation data shall be used to determine the acetone content for each coating.

VI. Miscellaneous Requirements

1. In accordance with OAC rule 3745-31-05(D), sections A.I, A.II, A.III, A.IV, and A.V of these terms and conditions constitute the federally enforceable portions of this permit to install.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3.	NONE	See B.VI.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit was install prior to the Ohio EPA's Air Toxic Policy. OAC Chapter 3745-31 requires permittees to apply 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R003 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6 (Modification).	OAC rule 3745-31-05(A)(3)	256.0 pounds of VOC per day for coatings 98.4 pounds of acetone per day for coatings 18.0 tons of acetone per year for coatings 2.41 tons of PM per year
	OAC rule 3745-31-05(D)	The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. 17.31tons of volatile organic compounds (VOC) per rolling 12-month period for coatings and cleanup materials See A.II.1 below.
	OAC rule 3745-17-07(A)	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 pound of particulate matter (PM) per hour
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures. The VOC content of the fleckstone coating, clear coat coating, and the cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively. The usage limits result in a 17.31 tons of VOC per year emission limitation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Fleckstone Coating Usage	Maximum Allowable Cumulative Clear Coat Coating Usage	Maximum Allowable Cumulative Cleanup Material Usage
1	1315.7 gallons	142.9 gallons	91.4 gallons
1-2	2631.4 gallons	285.7 gallons	182.9 gallons
1-3	3947.1 gallons	428.6 gallons	274.3 gallons
1-4	5262.9 gallons	571.4 gallons	365.7 gallons
1-5	6578.6 gallons	714.3 gallons	457.1 gallons
1-6	7894.3 gallons	857.1 gallons	548.6 gallons
1-7	9210.0 gallons	1000.0 gallons	640.0 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

2. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain records of the following information for the coating line:

   a. the MSDS sheets for each coating and cleanup material currently employed;

   b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and,

   c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.

2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:

   a. the company identification for each coating and cleanup material employed;

   b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;

   c. the number of gallons of each coating and photochemically reactive cleanup material employed;

   d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

   e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

   f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,

   g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

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

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000);

e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, then divided by 2000);

f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and,

g. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative VOC emissions for each calendar month.

4. The permittee shall maintain monthly records of the following information:

a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month; and,

b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative usage for each calendar month.

5. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and,

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

6. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fleckstone coating usage, clear coat coating usage, and cleanup material usage limitations and, for the first 12 calendar months of operation following the issuance of this permit to install, all exceedances of the maximum allowable cumulative usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating and/or a cleanup material which exceeds the VOC contents specified in Section A.II.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter 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 Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 135.0 lbs/day, and the actual daily VOC emissions for each such day.

7. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the acetone emissions exceeded 10.0 lbs/day, and the actual daily acetone emissions for each such day.

8. The permittee shall also submit annual reports which specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation

      8.0 pounds of organic compounds (OC) per hour

      40 pounds of OC per day

      Applicable Compliance Method

      Daily record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating photochemically reactive cleanup material, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

   b. Emission Limitation

      20% opacity as a 6-minute average, except as provided by rule

      Applicable Compliance Method

      OAC rule 3745-17-03(B)(1)

c. Emission Limitation

0.551 pound of PM per hour

Applicable Compliance Method:

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

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation

17.31 tons of VOC per rolling 12-month period for coatings and cleanup materials

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the VOC content of each coating and cleanup material as required in Sections A.III.3 and A.III.5 above. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

e. Emission Limitation

256.0 pounds of VOC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.5 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tons of PM per year

Applicable Compliance Method:

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

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

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 = 0.75

CE = fractional control efficiency of the control equipment =0.90

g. Emission Limitation

98.4 pounds of acetone per day for coatings

18.0 tons of acetone per year for coatings

Applicable Compliance Method

Record keeping of coating usage and the acetone content of each coating as required in Section A.III.5 above. Formulation data shall be used to determine the acetone content for each coating.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-1940 shall supersede all the air pollution control requirements for R003 in permits to install 16-1328.

2. In accordance with OAC rule 3745-31-05(D), sections A.I, A.II, A.III, A.IV, and A.V of these terms and conditions constitute the federally enforceable portions of this permit to install.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R003 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6 (Modification).	NONE	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit (R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 45.0*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 9624

MAGLC (ug/m3): 28261.9

*Combined emission rates for R003, R004, and R006.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and,

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1(Modification).	OAC rule 3745-31-05(A)(3)	117.0 pounds of VOC per day for coatings 252.0 pounds of acetone per day for coatings 50.0 tons of acetone per year for coatings and cleanup materials 2.41 tons of PM per year
	OAC rule 3745-31-05(D)	The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. 5.74 tons of volatile organic compounds (VOC) per rolling 12-month period for coatings See A.II.1 below.
	OAC rule 3745-17-07(A)	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 pound of particulate matter (PM) per hour See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 0.94 ton per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. The VOC content of the car color coating and the red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively. The usage limits result in a 5.74 tons of VOC per year emission limitation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Car Color Coating Usage	Maximum Allowable Cumulative Red Spot Primer Coating Usage
1	414.3 gallons	442.9 gallons
1-2	828.6 gallons	885.7 gallons
1-3	1242.9 gallons	1328.6 gallons
1-4	1657.1 gallons	1771.4 gallons
1-5	2071.4 gallons	2214.3 gallons
1-6	2485.7 gallons	2657.1 gallons
1-7	2900.0 gallons	3100.0 gallons
1-8	2900.0 gallons	3100.0 gallons
1-9	2900.0 gallons	3100.0 gallons
1-10	2900.0 gallons	3100.0 gallons
1-11	2900.0 gallons	3100.0 gallons
1-12	2900.0 gallons	3100.0 gallons

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The permittee shall only employ cleanup material that does not contain VOC as defined in OAC rule 3745-21-01(B)(6).

3. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain records of the following information for the coating line:

   a. the MSDS sheets for each coating and cleanup material currently employed;

   b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and,

   c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.

2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:

   a. the company identification for each coating and cleanup material employed;

   b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;

   c. the number of gallons of each coating and photochemically reactive cleanup material employed;

   d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

   e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

   f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for this emissions unit:

a. the name and identification of each cleanup material employed; and

b. documentation as to whether or not the cleanup material contains VOC.

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

a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, then divided by 2000); and

b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative VOC emissions for each calendar month.

5. The permittee shall maintain monthly records of the following information:

a. the car color coating usage and the red spot primer coating usage for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative coating usage for each calendar month.

6. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

7. The permittee shall collect and record the following information each month for the coating line:

a. the name and identification number of each cleanup material employed;

b. the acetone content of each cleanup material, in pounds per gallon;

c. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions in Section A.III.1.f above for each month, then divided by 2000);

d. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000); and

e. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (c) plus (d)).

8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month car color coating usage and red spot primer coating usage limitations and, for the first 12 calendar months of operation following the issuance of this permit to install, all exceedances of the maximum allowable cumulative coating usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing "VOC" (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating which exceeds the VOC contents specified in Section A.II.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter 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 Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

7. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.

8. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the acetone emissions exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.

9. The permittee shall also submit annual reports which specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

8.0 pounds of organic compounds (OC) per hour

40 pounds of OC per day

Applicable Compliance Method

Daily record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating photochemically reactive cleanup material, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

c. Emission Limitation

0.551 pound of PM per hour

Applicable Compliance Method:

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

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation

5.74 tons of VOC per rolling 12-month period for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Sections A.III.4 and A.III.6 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

e. Emission Limitation

117.0 pounds of VOC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.6 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tons of PM per year

Applicable Compliance Method:

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

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

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 = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation

252.0 pounds of acetone per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the acetone content of each coating as required in Section A.III.6 above. Formulation data shall be used to determine the acetone content for each coating.

h. Emission Limitation

50.0 tons of acetone per year for coatings and cleanup materials

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the acetone content of each coating and cleanup material as required in Sections A.III.6 and A.III.7 above. Formulation data shall be used to determine the acetone content for each coating.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-1940 shall supersede all the air pollution control requirements for R004 in permits to install 16-1332.

2. In accordance with OAC rule 3745-31-05(D), sections A.I, A.II, A.III, A.IV, and A.V of these terms and conditions constitute the federally enforceable portions of this permit to install.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1(Modification).	NONE	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 45.0*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 9624

MAGLC (ug/m3): 28261.9

*Combined emission rates for R003, R004, and R006.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R006 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #7 (Modification).	OAC rule 3745-31-05(A)(3)	256.0 pounds of VOC per day for coatings 98.4 pounds of acetone per day for coatings 18.0 tons of acetone per year for coatings 2.41 tons of PM per year
	OAC rule 3745-31-05(D)	The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. 17.31 tons of volatile organic compounds (VOC) per rolling 12-month period for coatings and cleanup materials See A.II.1 below.
	OAC rule 3745-17-07(A)	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 pound of particulate matter (PM) per hour
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures. The VOC content of the fleckstone coating, clear coat coating, and the cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively. The usage limits result in a 17.31 tons of VOC per year emission limitation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Fleckstone Coating Usage	Maximum Allowable Cumulative Clear Coat Coating Usage	Maximum Allowable Cumulative Cleanup Material Usage
1	1315.7 gallons	142.9 gallons	91.4 gallons
1-2	2631.4 gallons	285.7 gallons	182.9 gallons
1-3	3947.1 gallons	428.6 gallons	274.3 gallons
1-4	5262.9 gallons	571.4 gallons	365.7 gallons
1-5	6578.6 gallons	714.3 gallons	457.1 gallons
1-6	7894.3 gallons	857.1 gallons	548.6 gallons
1-7	9210.0 gallons	1000.0 gallons	640.0 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

2. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain records of the following information for the coating line:

   a. the MSDS sheets for each coating and cleanup material currently employed;

   b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

   c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.

2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:

   a. the company identification for each coating and cleanup material employed;

   b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;

   c. the number of gallons of each coating and photochemically reactive cleanup material employed;

   d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

   e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

   f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

   g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

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

   a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000);

e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, then divided by 2000);

f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and

g. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative VOC emissions for each calendar month.

4. The permittee shall maintain monthly records of the following information:

a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of this permit to install, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall record the cumulative usage for each calendar month.

5. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

6. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fleckstone coating usage, clear coat coating usage, and cleanup material usage limitations and, for the first 12 calendar months of operation following the issuance of this permit to install, all exceedances of the maximum allowable cumulative usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating and/or a cleanup material which exceeds the VOC contents specified in Section A.II.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter 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 Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 256.0 lbs/day, and the actual daily VOC emissions for each such day.

7. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the acetone emissions exceeded 98.4 lbs/day, and the actual daily acetone emissions for each such day.

8. The permittee shall also submit annual reports which specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation

   8.0 pounds of organic compounds (OC) per hour

   40 pounds of OC per day

   Applicable Compliance Method

   Daily record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating photochemically reactive cleanup material, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

   b. Emission Limitation

   20% opacity as a 6-minute average, except as provided by rule

   Applicable Compliance Method

   OAC rule 3745-17-03(B)(1)

c. Emission Limitation

0.551 pound of PM per hour

Applicable Compliance Method:

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

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

d. Emission Limitation

17.31 tons of VOC per rolling 12-month period for coatings and cleanup materials

Applicable Compliance Method

Record keeping of coating and cleanup material usage and the VOC content of each coating and cleanup material as required in Sections A.III.3 and A.III.5 above. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

e. Emission Limitation

256.0 pounds of VOC per day for coatings

Applicable Compliance Method

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.5 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tons of PM per year

Applicable Compliance Method:

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

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

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 = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation

98.4 pounds of acetone per day for coatings

18.0 tons of acetone per year for coatings

Applicable Compliance Method

Record keeping of coating usage and the acetone content of each coating as required in Section A.III.5 above. Formulation data shall be used to determine the acetone content for each coating.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-1940 shall supersede all the air pollution control requirements for R006 in permits to install 16-1376.

2. In accordance with OAC rule 3745-31-05(D), sections A.I, A.II, A.III, A.IV, and A.V of these terms and conditions constitute the federally enforceable portions of this permit to install.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R006 - Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #7 (Modification).	NONE	See B.III.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit (R006) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

   Pollutant: acetone

   TLV (mg/m3): 1187

   Maximum Hourly Emission Rate (lbs/hr): 45.0*

   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 9624

MAGLC (ug/m3): 28261.9

*Combined emission rates for R003, R004, and R006.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 16-01940 Facility ID: 1652050060

FACILITY NAME Plasti-Kote Co

FACILITY DESCRIPTION Modification to the PTI emission limitations for spray paint booths R003, R004, and R006 and the addition of a new spray paint booth K002.

CITY/TWP Medina

SIC CODE 2851 SCC CODE 4-02-022-01 EMISSIONS UNIT ID K002

EMISSIONS UNIT DESCRIPTION Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3.

DATE INSTALLED June 1974

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.03	0.551 lb/hr	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds			2.5	117.0 lbs/day	6.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Acetone			3.2	252.0 lbs/day	50.0

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the terms and conditions of the permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Acetone

NEW SOURCE REVIEW FORM B

PTI Number: 16-01940 Facility ID: 1652050060

FACILITY NAME Plasti-Kote Co

FACILITY DESCRIPTION Modification to the PTI emission limitations for spray paint booths R003, R004, and R006 and the addition of a new spray paint booth K002.

CITY/TWP Medina

SIC CODE 2851 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6 (Modification).

DATE INSTALLED June 1961

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.2	0.551 lb/hr	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds			7.9	256.0 lbs/day	17.31
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Acetone			0.1	98.4 lbs/day	18.0

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of the permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Acetone

NEW SOURCE REVIEW FORM B

PTI Number: 16-01940 Facility ID: 1652050060

FACILITY NAME Plasti-Kote Co

FACILITY DESCRIPTION Modification to the PTI emission limitations for spray paint booths R003, R004, and R006 and the addition of a new spray paint booth K002.

CITY/TWP Medina

SIC CODE 2851 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1(Modification).

DATE INSTALLED June 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.03	0.551 lb/hr	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds			2.5	117.0 lbs/day	5.74
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Acetone			3.1	252.0 lbs/day	50.0

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and condition of the permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ___ NO

IDENTIFY THE AIR CONTAMINANTS: Acetone

NEW SOURCE REVIEW FORM B

PTI Number: 16-01940 Facility ID: 1652050060

FACILITY NAME Plasti-Kote Co

FACILITY DESCRIPTION Modification to the PTI emission limitations for spray paint booths R003, R004, and R006 and the addition of a new spray paint booth K002.

CITY/TWP Medina

SIC CODE 2851 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #7 (Modification).

DATE INSTALLED June 1994

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.2	0.551 lb/hr	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds			7.9	256.0 lbs/day	17.31
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Acetone			0.1	98.4 lbs/day	18.0

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of the permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

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Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

The calculations and modeling was faxed to Safaa El Oraby on January 28, 2000. If these documents were also lost, please contact me and I will resend them.

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

A. Source Description

Plasti-Kote Company, Inc. currently consists of two boilers (B001 and B002), twenty-seven paint mixing stations (P007 and Z032 - Z057) , seven spray booths (K001-K003 and R003-R006), forty-one storage tanks (T001 - T034 and Z020 - Z026), six container filling lines (P002 - P006 and P008), a degassing booth (Z001), a rework gasser (Z002), an automatic tank washing station (Z004), an automatic drum washer (Z005), a manual tank washing station (Z017), a ball mill (Z018), a SW mill (Z019), two mill pre-mix stations (Z027 and Z028), three sand mills (Z029 - Z031) The current permit to install (PTI) application is for the modification of spray booths R003, R004, and R006 and for the installation of spray booth K002.

B. Facility Emissions, New Source Emissions, and Attainment Status

Medina County is designated as attainment status for ozone (VOC). This facility emits volatile organic compounds (VOC) and particulate emissions from the above mentioned sources. The permittee has requested that the emissions from R003, R004, R006, and K002 be limited in order to maintain the facility emissions to below PSD triggering levels.

C. Conclusion

The terms and conditions in the PTI will limit the facility's VOC emissions to less than PSD thresholds by placing coating usage restrictions on the coating lines. Plasti-Kote Company, Inc. will maintain records to demonstrate compliance with the rolling, 12-month usage limitations.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PM	9.64

NEW SOURCE REVIEW FORM B

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VOC	**46.46**
Acetone	**136.0**

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