



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL

MADISON COUNTY

Application No: 01-12102

Fac ID: 0149000089

DATE: 3/6/2007

Stanley Electric US Company Inc
C. Ben Bosah
3575 Head of Pond Road
London, OH 43054

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

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, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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

Sincerely,

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

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "01-12102"

A. Source Description

Stanley Electric U.S. Company, Inc. (Stanley), located in London, Ohio is a facility that manufactures automotive headlights. Stanley received a final title V permit on January 20, 2000 and has applied for a renewal permit. This PTI involves the addition of two new coating lines at the facility, emission unit identifications R041 and R042. The two new units will involve the use of Permanent Total Enclosures that exhaust to a single new Regenerative Thermal Oxidizer. These new coating lines are similar in design and construction to other units that have been permitted and installed at the facility.

B. Facility Emissions and Attainment Status

Stanley is located in Madison County, Ohio which is considered non-attainment for ozone and attainment for all other pollutants. The potential to emit for the facility, including the federally enforceable synthetic minor limitations of this PTI, remain below the 100 TPY threshold for PSD applicability in a non-attainment area.

C. Source Emissions

The PTI is being issued as a synthetic minor with federally enforceable limitations for OC emissions and federally enforceable restrictions on coating, cleanup material and degreasing material usage. The OC limitation for R041 is 6.24 TPY and for R042 is 8.70 TPY per rolling, 12-month period. For R041 the rolling 12-month usage limitations will be as follows; 12,012 gallons of Antifog coating, 25,284 gallons of Hardcoat coating and 3600 gallons of cleanup material. For R042 the rolling 12-month usage limitations will be as follows; 34,200 gallons of UV Basecoat 1, 34,200 gallons of UV Basecoat 2, 1,042 gallons of degreasing material and 732 gallons of cleanup material.

D. Conclusion

The permit includes federally enforceable limits, operational restrictions and monitoring, recordkeeping and reporting requirements to ensure continual compliance with the permit limitations.



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-12102

Application Number: 01-12102
Facility ID: 0149000089
Permit Fee: **To be entered upon final issuance**
Name of Facility: Stanley Electric US Company Inc
Person to Contact: C. Ben Bosah
Address: 3575 Head of Pond Road
London, OH 43054

Location of proposed air contaminant source(s) [emissions unit(s)]:
**420 E High Street
London, Ohio**

Description of proposed emissions unit(s):
2 spray painting booths, 1 infra red oven, 1 ultra violet oven, 2 degreasers and 2 mettallizers.

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

Chris Korleski
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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and

October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

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

10. Permit-To-Operate Application

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

13. Permit-To-Install

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	14.94

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. The permittee is subject to the rules of the Subpart PPPP MACT standard as an existing major source with a compliance date as specified in the final standard. As specified in the Subpart, the permittee shall submit the following notifications:
 - a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the source's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
 - v. a statement confirming the facility is a major source for HAPs.
 - b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
 - i. the methods used to determine compliance;
 - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

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 - (R041) - Combined Antifog and Hardcoat line with three ovens, a mask wash and regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See Section A.I.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	See Sections A.I.2.a and 2.b, A.II.1, A.II.2 and A.II.3 below.
OAC rule 3745-21-07(G)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(C).
OAC rule 3745-17-11(B)(1)	Particulate Emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible PE shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule.
MACT - 40 CFR Part 63, Subpart PPPP	See Section II.A.1 of the Facility Specific Terms and Conditions for this permit.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Organic Compound (OC) emissions from this air contaminant source because the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 6.24 tons per year (TPY) of OC under OAC rule 3745-31-05(C).
- 2.b OC emissions shall not exceed 6.24 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.c The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the following pollutants from natural gas usage in the incinerator and drying ovens

because the uncontrolled potential to emit for each pollutant is less than ten tons per year:

- NO_x
- SO₂
- CO
- PE
- OC

2.d The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 12,012 gallons of Antifog coating (maximum OC content of 6.7 lb/gal), and 25,284 gallons of Hardcoat coating (maximum OC content of 5.58 lb/gal), based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Antifog Coating Usage</u>	<u>Maximum Allowable Hardcoat Coating Usage</u>
1	1001	2107
1-2	2002	4214
1-3	3003	6321
1-4	4004	8428
1-5	5005	10535
1-6	6006	12642
1-7	7007	14749
1-8	8008	16856
1-9	9009	18963
1-10	10010	21070
1-11	11011	23177
1-12	12012	25284

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

2. The maximum annual usage for this emissions unit shall not exceed 3,600 gallons of cleanup material (maximum OC content of 7.72 lb/gal), based upon a rolling, 12-month summation of the cleanup material usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Cleanup Material Usage</u>
1	300
1-2	600
1-3	900
1-4	1200
1-5	1500
1-6	1800
1-7	2100
1-8	2400
1-9	2700
1-10	3000
1-11	3300
1-12	3600

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

3. The permittee shall control the OC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal oxidizer with a minimum overall control efficiency of 95%. The PTE shall be maintained under negative pressure, at a minimum differential pressure that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
5. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;

- c. the total gallons of all coatings and total gallons of all cleanup materials employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total OC emission rate for all coatings and cleanup materials, in pounds per month for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
2. The permittee shall maintain monthly records of the following information:
- a. the rolling, 12-month summation of each coating employed, in gallons;
 - b. the rolling, 12-month summation of the cleanup material usage (less any cleanup material sent off-site for recycle, recovery, and/or disposal) in gallons; and
 - c. the rolling, 12-month summation of OC emissions from coating and cleanup usage, in pounds or tons.
3. The permittee shall install, operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day for the control equipment:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
4. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R041. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month coating usage limitation for each coating employed;
 - b. all exceedances of the rolling, 12-month cleanup material usage limitation;
 - c. all exceedances of the rolling, 12-month OC emission limitation of 6.24 tons;
 - d. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per U.S. EPA Test Method 204, when the emissions unit was in operation;
 - e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance (when the emissions unit was in operation); and
 - f. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total OC emissions for the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

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 -
OC emissions shall not exceed 6.24 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method -
Compliance with this emission limitation may be determined through the record keeping required in Section A.III.2 above.

- b. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method -
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- c. Usage Limitations -
12,012 gallons of Antifog coating per rolling, 12-month period.
25,284 gallons of Hardcoat coating per rolling, 12-month period.
3,600 gallons of cleanup materials per rolling, 12-month period.

Applicable Compliance Method -
Compliance with these usage limitations may be determined through the record keeping required by Section A.III.2. above.

- d. Emission Limitation -
Use of a PTE and thermal incinerator with a minimum overall control efficiency of 95%.

Applicable Compliance Method -
Compliance with this emission limitation shall be determined through the emission testing requirements described in Section V.2 below.

- e. Emission Limitation -
Particulate Emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method -
The potential to emit for PE was established by multiplying the maximum PE content of the coating used in the emissions unit (1.93 lbs PE/gallon of coating) by the coating's maximum usage in any hour (3.01 gallons/hr) and crediting for transfer and control efficiency using the following calculations:

PE emissions/hr =(maximum PE content of coating) x (maximum coating usage in one hour) x (1-TE) x (1-CE)

where:

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for dry filtration control)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for Organic Compounds.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1-4 and Method 25, or 25A and Method 204.

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

- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and

date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State 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 - (R041) - Combined Antifog and Hardcoat line with three ovens, a mask wash and regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See section B.III.1 below.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the pollutants associated with this emissions unit that qualify as toxic air contaminants to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart PPPP, which was promulgated less than 5 years ago on April 19, 2004.

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 - (R042) - Dual paint spray booth with two degreasers, two ovens and regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See Section A.I.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	See Sections A.I.2.a and 2.b, A.II.1, A.II.2 and A.II.3 below.
OAC rule 3745-21-07(G)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(C).
OAC rule 3745-17-11(B)(1)	Particulate Emissions (PE) shall not exceed 0.551 lb/hr.
OAC rule 3745-17-07(A)	Visible PE shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule.
MACT - 40 CFR Part 63, Subpart PPPP	See Section II.A.1 of the Facility Specific Terms and Conditions for this permit.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Organic Compound (OC) emissions from this air contaminant source because the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8.70 tons per year (TPY) of OC under OAC rule 3745-31-05(C).
- 2.b OC emissions shall not exceed 8.70 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.c The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the following pollutants from natural gas usage in the incinerator and drying ovens

because the uncontrolled potential to emit for each pollutant is less than ten tons per year:

- NO_x
- SO₂
- CO
- PE
- OC

2.d The hourly particulate emission limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop recording keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 34,200 gallons of UV Basecoat1 coating (maximum OC content of 4.9 lb/gal), and 34,200 gallons of UV Basecoat2 coating (maximum OC content of 4.8 lb/gal), based upon a rolling, 12-month summation of the coating usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable UV Basecoat1 Coating Usage</u>	<u>Maximum Allowable UV Basecoat2 Coating Usage</u>
1	2850	2850
1-2	5700	5700
1-3	8550	8550
1-4	11400	11400
1-5	14250	14250
1-6	17100	17100
1-7	19950	19950
1-8	22800	22800
1-9	25650	25650
1-10	28500	28500
1-11	31350	31350
1-12	34200	34200

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

2. The maximum annual degreasing material usage for this emissions unit shall not exceed 1,042 gallons of n-Propyl Bromide (maximum OC content of 11.29 lb/gal), based upon a rolling, 12-month summation of the degreasing material usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable n-Propyl Bromide Usage</u>
1	86
1-2	174
1-3	260
1-4	347
1-5	434
1-6	521
1-7	608
1-8	694
1-9	781
1-10	868
1-11	955
1-12	1042

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

- The maximum annual cleanup material usage for this emissions unit shall not exceed 732 gallons of Methyl Isobutyl Ketone (MIBK) (maximum OC content of 6.59 lb/gal), based upon a rolling, 12-month summation of the cleanup usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable MIBK Usage</u>
1	61
1-2	122
1-3	183
1-4	244
1-5	305
1-6	366
1-7	427
1-8	488
1-9	549
1-10	610
1-11	671
1-12	732

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating, cleanup and degreasing material employed;
 - b. the number of gallons of each coating, cleanup and degreasing material employed;
 - c. the total gallons of all coatings, cleanup and degreasing materials employed;
 - d. the OC content of each coating, cleanup and degreasing material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup and/or degreasing materials is to be used in emission calculations, the number of gallons of cleanup and/or degreasing material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total OC emission rate for all coatings, cleanup and degreasing materials, in pounds per month for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
2. The permittee shall maintain monthly records of the following information:
 - a. the rolling, 12-month summation of each coating employed, in gallons;
 - b. the rolling, 12-month summation of the cleanup material usage (less any cleanup material sent off-site for recycle, recovery, and/or disposal) in gallons; and
 - c. the rolling, 12-month summation of the degreasing material usage (less any degreasing material sent off-site for recycle, recovery, and/or disposal) in gallons; and
 - d. the rolling, 12-month summation of OC emissions from coating and cleanup usage, in pounds or tons.
3. The permittee shall install, operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device shall be capable of accurately measuring the desired

parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
4. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R042. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month coating usage limitation for each coating employed;
 - b. all exceedances of the rolling, 12-month cleanup material usage limitation;
 - b. all exceedances of the rolling, 12-month degreasing material usage limitation;
 - c. all exceedances of the rolling, 12-month OC emission limitation of 8.70 tons;
 - d. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per U.S. EPA Test Method 204, when the emissions unit was in operation;
 - e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average

temperature during the most recent performance test that demonstrated the emissions unit was in compliance (when the emissions unit was in operation); and

- f. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total OC emissions for the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

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 -
OC emissions shall not exceed 8.70 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method -
Compliance with this emission limitation may be determined through the record keeping required in Section A.III.2 above.
 - b. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method -
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Usage Limitations -
34,200 gallons of UV Basecoat1 coating per rolling, 12-month period.
34,200 gallons of UV Basecoat2 coating per rolling, 12-month period.
732 gallons of cleanup materials per rolling, 12-month period.
1042 gallons of degreasing materials per rolling, 12-month period.

Applicable Compliance Method -

Compliance with these usage limitations may be determined through the record keeping required by Section A.III.2. above.

d. Emission Limitation -

Use of a PTE and thermal incinerator with a minimum overall control efficiency of 95%.

Applicable Compliance Method -

Compliance with this emission limitation shall be determined through the emission testing requirements described in Section V.2 below.

e. Emission Limitation -

Particulate Emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method -

The potential to emit for PE was established by multiplying the maximum PE content of the coating used in the emissions unit (3.09 lbs PE/gallon of coating) by the coating's maximum usage in any hour (8.14 gallons/hr) and crediting for transfer and control efficiency using the following calculations:

$$\text{PE emissions/hr} = (\text{maximum PE content of coating}) \times (\text{maximum coating usage in one hour}) \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for dry filtration control)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for Organic Compounds.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1-4 and Method 25, or 25A and Method 204.

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

- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State 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 - (R042) - Dual paint spray booth with two degreasers, two ovens and regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See section B.III.1 below.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the pollutants associated with this emissions unit that qualify as toxic air contaminants to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart PPPP, which was promulgated no more than 5 years ago on April 19, 2004.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None