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: FINAL PERMIT TO INSTALL
ASHTABULA COUNTY
Application No: 02-19379
Fac ID: 0204020245

DATE: 12/28/2004

CERTIFIED MAIL

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

Venture Holdings Corporation
David Murtha
333 Gore Rd
Conneaut, OH 43130

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/28/2004**
Terms and Conditions	**Effective Date: 12/28/2004**

FINAL PERMIT TO INSTALL 02-19379

Application Number: 02-19379

Facility ID: 0204020245

Permit Fee: **$200**

Name of Facility: Venture Holdings Corporation

Person to Contact: David Murtha

Address: 333 Gore Rd
Conneaut, OH 43130

Location of proposed air contaminant source(s) [emissions unit(s)]:
333 Gore Rd
Conneaut, **Ohio**

Description of proposed emissions unit(s):
Service parts paint line.

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.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 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 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.

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

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. 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.

5. 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 cannot meet the requirements of this permit 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 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., 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
PE	0.15
OC	29.7
CO	1.81
NO_X	2.19

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. On April 19, 2004 U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants fro Surface Coating of Plastic Parts and Products, Subpart PPPP. The facility will be subject as a new major source with a compliance date as specified in the NESHAP.

2. As specified in 40 CFR Part 63.4510, within 120 calendars days after initial startup of a new affected source subject to 40 CFR Part 63, Subpart PPPP, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):

a. the name and mailing address of the permittee;

b. the physical location of the source if it is different from the mailing address;

c. identification of the relevant MACT standard and the source's compliance date;

d. 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

e. a statement confirming the facility is a major source for HAPs.

3. The Initial Notification Report shall be sent to the following addresses:

a. Mr. Robert Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA, Lazarus Government Center, P.O. Box 1049, Columbus, OH 43216-1049;

b. DAPC, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087-1969; and

c. Mr. George T. Czerniak, AE-17J, U.S. EPA Region V, 77 West Jackson Boulevard, Chicago, IL 60604-3507.

4. As specified in 40 CFR 63.4510(c) within 30 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63 Subpart PPPP, the permittee shall submit a Notification of Compliance Status Report required by 40 CFR 63.9(h). The report shall include information specified in Part III. Section A.IV.

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
K001 - Coating line for plastic parts: 2.5 mmBtu/hr natural gas-fired (water) dry off oven and 2.5 mmBtu/hr natural gas-fired (paint) dry off oven	OAC rule 3745-31-05(A)(3)	There shall be no visible particulate emissions (PE) from the natural gas-fired water dry off oven egress, D01, nor any visible PE from the natural gas-fired paint dry off oven egress, O1, during any 30 minute observation period. The PE rate shall not exceed 0.0057 lb PE/hr from each oven egress. The carbon monoxide (CO) emissions rate shall not exceed 0.206 lb/hr from each oven egress and shall not exceed 1.81 ton/yr from both ovens. The nitrogen oxides (NO_X) emissions rate shall not exceed 0.25 lb/hr from each oven egress and shall not exceed 2.19 ton/yr from both ovens. The organic compound (OC) emissions rate shall not exceed 0.027 lb/hr from each oven egress. See section A.II.1.
	OAC rule 3745-17-07(A) OAC rule 3745-17-10(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-23-06(B)	See section A.I.2.a.
paint spray operation and cleanup operations	OAC rule 3745-31-05(A)(3)	Visible PE shall not exceed 0% opacity, as a 6-minute average, from the paint spray booth egress, B1. The PE rate shall not exceed 0.21 lb PE/hr from the booth egress, B1. The OC emissions shall be limited to 621 lbs/day from the paint

		spray operation. The OC emissions shall be limited to 1741 lbs/month from the cleanup operations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and 40 CFR, Part 63, Subpart PPPP. See sections A.II.2. , A.II.3. and A.II.4.
	OAC rule 3745-21-07(G)(2)	See section A.II.3.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	The combined volatile organic compound (VOC) emissions from the paint spray operation and the cleanup operations shall be limited to 29.7 tons/year, based upon a rolling, 12-month summation of the monthly emissions. See section A .2.b.
	40 CFR, Part 63, Subpart PPPP	See sections A.2.c., A.2.d. and Part II section A.
All operations	OAC rule 3745-31-05(A)(3)	The PE rate shall not exceed 0.26 ton/year. The OC emissions shall not exceed 30.0 tons/year.

2. Additional Terms and Conditions

Ohio Best Available Technology Requirements

2.a The permittee shall minimize NO_X emissions by use of the latest available control techniques and operating practices in accordance with best current technology.

VOC Emissions Restriction

2.b To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table from the paint spray operation and the cleanup operation:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	2.48
1-2	4.95
1-3	7.42
1-4	9.90
1-5	12.4
1-6	14.8
1-7	17.3
1-8	19.8
1-9	22.3
1-10	24.8
1-11	27.2
1-12	29.7

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

Maximum Achievable Control Technology (MACT) rule requirements, 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products: HAP Emissions Limits

2.c The organic HAP emissions of surface coatings shall be limited as specified in 40 CFR 63.4490(a), which are as follows:

i. 0.16 lb organic HAP/lb solids used during each 12-month compliance period for general use operations;

ii. 0.26 lb HAP/lb solids used during each 12-month compliance period for automotive lamp operations;

iii. 0.22 lb HAP/lb solids used during each 12-month compliance period for Thermoplastic Olefin (TPO) operations; and

iv. 1.34 lb HAP/lb solids used during each 12-month compliance period for new assembled on-road vehicle operations.

2.d The compliance options for meeting the HAP emissions limits must be evaluated as follows:

i. General Requirements for All Compliance Options: The permittee must include all coatings, as defined in 40 CFR 63.4581, thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490. To make this determination, the permittee must use at least one of the three compliance options listed in paragraphs (a) through (c) of 40 CFR

63.4491. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4530(c), and the permittee must report it in the next semiannual compliance report required in 40 CFR 63.4520; and

ii. Compliant Material Option: The permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 40 CFR 63.4541, and 40 CFR 63.4542 to demonstrate compliance with the applicable emission limit using this option; or

iii. Emission Rate Without Add-on Controls Option: The permittee must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.4550, 40 CFR 63.4551, and 40 CFR 63.4552 to demonstrate compliance with the emission limit using this option.

II. Operational Restrictions

1. The permittee shall burn only natural gas in the water dry off oven and in the paint dry off oven.

2. The permittee shall operate the dry filtration system whenever the paint spray equipment is in operation.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

4. The use of cleanup materials, containing hazardous air pollutant (HAP) compounds, is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the water dry off oven and in the paint dry off oven.

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the paint spray equipment was in operation.

3. The permittee shall collect and record the following information for each day for the paint spray operation:

   a. the date of operation;

   b. the company identification for each coating material employed;

   c. an identification of the coating operations classification (i.e. general use operation, automotive lamp operation, TPO operation or assembled on-road vehicle operation) for each coating material employed;

   d. the number of gallons of each coating material employed;

   e. the OC content of each coating and the VOC content, in pounds per gallon; and

   f. the total OC emission rate for all coatings materials, in pounds per day.

4. The permittee shall collect and record the following information for each month for the paint spray operation(s), the cleanup operation(s) and :

   a. the month of operation;

   b. the company identification for each coating material employed;

   c. the coating material HAP content determined as follows:

      i. for the compliant material option, the HAP content of each coating, in lb HAP per lb solids, using equation 1 of 40 CFR 63.4541; or

      ii. for the emission rate without add-on controls option, the following information:

   d. a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR 63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4);

      i. the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and

ii the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551;

e. the company identification of each cleanup/purge material employed;

f. the total volume of each cleanup/purge material applied, in gallons;

g. the OC content, the VOC content and the HAP content of each cleanup/purge material applied, in pound per gallon;

h. if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports, records of the total amount (gallons) of cleanup and purge material collected from this emissions unit and added to the recovery tank/drum, for recycle/recovery and/or disposal at an outside facility, shall be maintained as required in Section A.III.6.;

i. if a credit for recovered cleanup/purge material is used, the volume of this material added to the recovery tank/drum, in gallons per month;

j. if a credit for recovered materials is used, the adjusted volume of cleanup/purge materials employed, calculate by subtracting the volume of the recovered cleanup/purge material added to the recovery tank/drum (h), from the volume of the total cleanup/purge material applied (e), in gallons per month;

k. the total OC emissions rate for all cleanup/purge materials, in pounds per month; and

l. the number of hours of operation of each dry off oven.

5. The permittee shall maintain monthly records of the following information from the paint spray operation and the cleanup operation:

a. the VOC emissions, in tons;

b. during the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from the paint spray operation and the cleanup operation, in tons; and

c. (beginning the 13th calendar month after permit issuance) the combined VOC emissions from the paint spray operation and the cleanup operation, in tons, as a rolling, 12-month summation.

6. The permittee shall maintain the following information and records in the specified format(s) for the paint spray operation and the cleanup operation:

a. A current copy of information provided by materials suppliers or manufacturers, such as:

i. manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, the mass fraction of coating solids for each coating, and a determination of whether each surface coating and each cleanup/purge material applied in this emissions unit is non-photochemically reactive or not;

ii. if testing was conducted to determine mass fraction of organic HAP, density, or mass fraction of coating solids, the permittee must keep a copy of the complete test report; and

iii. if information is provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided to you by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier;

b. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the recovery drum or tank serving this emissions unit:

i. the date the materials from the recovery drum(s) were removed for shipment off site; and

ii. the number of gallons of materials from the recovery drum(s) were removed for shipment off site;

c. A copy of each notification and report (i.e. Initial Notification Report, Notification of the Actual Date of Startup and Notification of Compliance Status Report) that you submitted to comply with 40 CFR, Part 63, Subpart PPPP, and the documentation supporting each notification and report; and

d. The above required records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years.

IV. Reporting Requirements

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

a. an identification of each day when a fuel other than natural gas was burned the water dry off oven or in the paint dry off oven; and

b. an identification of each day the dry filtration system was not in service when the paint spray equipment was in operation.

Each report shall be submitted within 30 days after the deviation occurs.

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

a. an identification of each day during which the OC emissions from the paint spray operations exceeded 621 pounds per day, and the actual OC emissions for each such day;

b. an identification of each month during which the OC emissions from the cleanup/purge operations exceeded 1741 pounds per month, and the actual OC emissions for each such month;

c. an identification of each day during which any photochemically reactive coatings or photochemically reactive cleanup/purge materials were employed;

d. an identification of each month during which any cleanup/purge materials with a HAP content were employed; and

e. an identification of 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 semi-annual deviation (excursion) reports which include the following information:

a. General Requirements of a Semi-annual Report:

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

iv. Identification of the compliance option or options specified in 40 CFR 63.4491 that were used on each coating operation during the reporting period. If the

permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option used.

v. If the emission rate without add-on controls was used, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

vi. <u>If there were no deviations</u> from the emission limitations in 40 CFR 63.4490, specified in section A.I.2.c., that apply, <u>the semiannual compliance report must include a statement that there were no deviations</u> from the emission limitations during the reporting period.

b. Deviation Reporting Requirements of a Semi-annual Report:

i. Compliant material option - If the compliant material option was used and there was a deviation from the applicable organic HAP content requirements in 40 CFR 63.4490, the semiannual compliance report must contain the following information:

(a) identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used;

(b) the calculation of the organic HAP content (using Equation 1 of 40 CFR 63.4541) for each coating identified in section A.IV.3.b.i.(1). The pemittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports);

(c) the determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in section A.IV.3.b.i.(1). The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports); and

(d) a statement of the cause of each deviation.

ii. Emission rate without add-on controls option - If the emission rate without add-on controls option was used and there was a deviation from the applicable emission limit in 40 CFR 63.4490, the semiannual compliance report must contain the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 CFR 63.4490;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of 40 CFR 63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports); and

(c) a statement of the cause of each deviation.

c. Due Dates for Semi-annual Reports are as follows:

i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in 40 CFR 63.4540 and 40 CFR 63.4550 and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

iii. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

4. A Notification of the Actual Date of Startup of this emissions unit, delivered or postmarked within 15 calendar days after that date shall be made to the Northeast District Office.

5. As specified in 40 CFR 63.9(h) and 40 CFR 63.4510(c), within 30 days following the end of the initial compliance period, described in 40 CFR 63.4540, 40 CFR 63.4550 and 40 CFR 63.4560, that applies to the affected source (this emissions unit), the permittee shall submit a Notification of Compliance Status Report that contains the following information:

a. company name and address;

b. statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. date of the report and beginning and ending dates of the reporting period. The reporting period is <u>the initial compliance period</u> as described in 40 CFR 63.4540 and 40 CFR 63.4550 that apply to this emissions unit and <u>begins on the date of initial startup</u> (which is the applicable compliance date specified in 40 CFR 63.4483) <u>and ends on the last day of the 12th month following the compliance date</u>. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months;

d. the methods used to determine compliance, i.e. identification of the compliance option or options specified in 40 CFR 63.4491 that you used on each coating operation in this emissions unit during the initial compliance period;

e. a description of the air pollution control equipment or (control) method for each emissions point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method;

f. a statement of whether or not the permittee achieved the emission limitations for the initial compliance period; and a statement of whether or not the permittee has complied with the other requirements of 40 CFR Part 63 Subpart PPPP;

g. if the permittee had a deviation (during the initial compliance period), include the information in paragraphs (5)(g)(i) and (ii) of this section:

   i. a description and statement of the cause of the deviation; and

   ii. if the permittee failed to meet the applicable emission limit in 40 CFR 63.4490, include all the calculations used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. The permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports;

h. the results of any monitoring procedures or methods that were conducted**.** For each of the data items listed in paragraphs (5)(i) through (m) of this section that is required by the compliance option(s) that were used to demonstrate compliance with the emission limit, include an example of how the permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to 40 CFR 63.4541(a), (b), or (c). The permittee does not need to submit copies of any test reports;

   i. mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material;

   ii. mass fraction of coating solids for one coating;

   iii. density for one coating, one thinner and/or other additive, and one cleaning material, except that if the permittee used the compliant material option, only the example coating density is required;

i. the amount of waste materials and the mass of organic HAP contained in the waste materials for which the permittee is claiming an allowance in Equation 1 of 40 CFR 63.4551;

j. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63 Subpart PPPP**.** The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the

compliance option(s) used, as specified in paragraphs (5)(m)(i) through (5)(m)(ii) of this section:

i. for the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 1 of 40 CFR 63.4541; and

ii. for the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of 40 CFR 63.4551;

k. an analysis demonstrating whether the affected source is a major source or an area source; and

l. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods.

6. The permittee shall submit annual reports which specify the PE rate and the emissions of OC, CO and NO_X from this emissions, in tons, for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation: No visible PE from the natural gas-fired water dry off oven egress, D01, nor any visible PE from the natural gas-fired paint dry off oven egress, O1, during any 30 minute observation period.

Applicable Compliance Method: Compliance shall be determined in accordance with Test Method 22 as set forth in Appendix A on Test Methods in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources), and the procedures specified in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

b. Emissions Limitations: 0.0057 lb PE/hr, 0.206 lb CO/hr, 0.25 lb NO_X/hr and 0.027 lb OC/hr from each oven egress, D01 and O1.

Applicable Compliance Method: To determine the actual emission rate the following equation may be used:
Ei_D01 = Ei_O1 = mmBtu/hr x EFi.

where:
Ei_D01 = Ei_O1 = the emissions rate from the water dry off oven or the paint dry off oven, in pounds per hour.

mmBtu/hr = the maximum rated heat input capacity, which is 2.5 million Btu per hour for each natural gas fired dry off oven, as noted in the permit application.

EFi = the emissions factor for pollutant i, which is as follows:
0.0019 lb PE/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98);
0.0824 lb CO/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98);
0.098 lb NO_X/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98); and
0.0108 lb OC/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98), assuming an average natural gas fuel heat value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 5, 10, 7E and 25, for the PE rate, CO, $NO_{X.}$ and OC emissions. Equivalent, alternative method(s) (as approved by Ohio EPA) may be performed.

c. Emissions Limitation: 0% opacity of visible PE, as a 6-minute average, from the paint spray booth egress, B1.

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.

d. Emission Limitation: 0.21 lb PE/hr from the paint spray operations.

Applicable Compliance Method(s): To determine the actual emission rate the following equation may be used:

EP_PE = Vi x Di x Solids Ratio_i x EF_PE x (1- CP) x (1 - CE).

Where the following applies:
E_PE = PE rate from paint spray operations, in pounds per hour.

Vi = the volume of paint coating "i" employed, in gallons per day.

Di = density of paint coating "i" employed, in lbs per gallon.

Solids Ratio_i = solids content of paint coating "i", in pound of available solids per pound of coating.

EF_PE = emission factor for uncontrolled PE, which is 0.50 pounds of uncontrolled PE per pound of available solids, i.e. a 50% transfer efficiency for air atomized high volume low pressure spray guns as noted in Chapter 10, Air Pollution Engineering Manual, 1992.

CP = capture efficiency of paint spray booth, which is 1.0 lb PE captured per lb uncontrolled PE as noted in the permit application.

CE = control efficiency of the PE control device, a paper filter, which is 0.99 lb PE controlled/lb uncontrolled PE as noted in the permit application.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

e. Emissions Limitation: 621 lbs OC/day from paint spray operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.3. Compliance may be determined based upon the following equation:

EP_OC = summation of [Vi x OCi)].

where:
EP_OC = OC emissions from the paint spray (production) operations, in pounds per day.

Vi = the volume of paint coating "i" employed, in gallons per day.

OCi = the OC content of paint coating "i", in pounds per gallon.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

f. Emissions Limitation: 1741 lbs/month from the cleanup/purge operations.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.4. Compliance may be determined based upon the following equation:

EC_OC = summation of (Vi x OCi).

where:
EC_OC = OC emissions from the cleanup/purge operations, in pounds per month.

Vi = the volume of cleanup/purge material applied, from Sections A.III.4.e. or A.III.4.i., in gallons per month.

OCi = the OC content of cleanup/purge material "i", in per pounds per gallon.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A or Method 18, or American Society for Testing and Materials (ASTM) D6420-99, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

g. Emission Limitations: 29.7 TPY VOC, as a rolling 12-month summation from the paint spray operations and the cleanup operations.

Applicable Compliance Method: Compliance shall be determined from the sum of the monthly VOC emissions from the paint spray operations and the cleanup operations, as specified by the record keeping requirement in section A.III.5.

h. Emission Limitation: 0.26 TPY PE from all operations.

Applicable Compliance Method(s): Compliance may be based upon the following equations:

i. Determination of the PE rate from fuel combustion at each oven egress, D01 and O1, i.e. EO1_PE/YR, the actual, hourly emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of section A.III.4., and divided by 2000 lbs/ton.

ii. Determination of the PE rate from paint spray operations, EP_PE/YR, shall be determined from the summation of the total mass of coating solids used each month, as specified by the method(s) sections A.V.2.a. and AV.2.b.

iii. Determination of total PE rate, ET_PE, may be determined as follows:
ET_PE = EDO1_PE/YR + EO1_PE/YR + EP_PE/YR.

i. Emission Limitation: 30.0 TPY OC from all operations.

Applicable Compliance Method(s): Compliance may be based upon the following equations:

i. Determination of the OC rate from fuel combustion at each oven egress, D01 and O1, i.e. EO1_OC/YR, the actual, hourly emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as recorded in the requirements of section A.III.4., and divided by 2000 lbs/ton.

ii. Determination of the OC rate from the paint spray operations is the sum of the daily OC emission rates, EP_OC, as recorded in the requirements of A.III..3., of this permit for the calendar year, divided by 2,000 pounds/ton.

iii. Determination of the OC rate from the cleanup operations is the sum of the monthly OC emission rates, EC_OC, as recorded in the requirements of A.III..4., of this permit for the calendar year, divided by 2,000 pounds/ton.

iv. Determination of total OC rate, ET_OC, may be determined as follows:
ET_OC = ED01_OC/YR + EO1_OC/YR + EP_OC + EC_OC.

j. Emission Limitations: 1.81 TPY CO and 2.19 TPY NO_X from both dry off ovens.

Applicable Compliance Method: To determine the annual rate for CO and NO_X the actual, hourly, emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, as specified in the record keeping requirements of section A.III.4., and divided by 2000 lbs/ton.

2. Emission Limitations: Organic HAP content limits for coatings used during each 12-month compliance period for the coating operation for the following classifications:

0.16 lb organic HAP/lb solids for general use operations;
0.26 lb HAP/lb solids for automotive lamp operations;
0.22 lb HAP/lb solids used for Thermoplastic Olefin (TPO) operations; and
1.34 lb HAP/lb solids for assembled on-road vehicle operations.

Applicable Compliance Method(s):

a. Compliant Material Option - Compliance may be based upon the following equations:

i. <u>Determine the mass fraction of organic HAP for each material used.</u> The permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in sections A.V.2.a.(1) through (5).

(a) Method 311 (Appendix A to 40 CFR part 63). The permitee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in sections A.V.2.a.i.(1)(a) and (b) when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, it does not have to be counted. Express the mass fraction of each organic HAP which is counted as a value truncated to four places after the decimal point (e.g., 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

(b) Method 24 (appendix A to 40 CFR part 60). For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP.

For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permitee may use the alternative method contained in appendix A to this subpart, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to this subpart, as a substitute for the mass fraction of organic HAP.

(c) Alternative method. The permittee may use an alternative test method for determining the mass fraction of organic HAP once the U.S. EPA Administrator has approved it. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

(d) Information from the supplier or manufacturer of the material. The permittee may rely on information other than that generated by the test methods specified in sections A.V.2.a.i.(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to sections A.V.2.a.i.(1) through (3) of this section, then the test method results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of Ohio EPA that the formulation data are correct.

(e) Solvent blends. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to 40 CFR, Part 63, Subpart PPPP. If the permittee uses the tables, the permittee must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the permittee may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to 40 CFR, Part 63, Subpart PPPP, the Method 311 results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of Ohio EPA that the formulation data are correct.

ii. Determine the mass fraction of coating solids for each coating. The permittee must determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in sections A.V.2.a.ii.(1) through (3).

(a) Method 24 (appendix A to 40 CFR part 60). Use Method 24 for determining the mass fraction of coating solids. For reactive adhesives in which some of the liquid fraction reacts to form solids, the permittee may use the alternative method contained in appendix A to this subpart, rather than Method 24, to determine the mass fraction of coating solids.

(b) Alternative method. The permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

(c) Information from the supplier or manufacturer of the material. The permittee may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of Ohio EPA that the formulation data are correct.

(d) Calculate the organic HAP content of each coating. Calculate the organic HAP content, kg (lb) organic HAP emitted per kg (lb) coating solids used, of each coating used during the compliance period using Equation 1 noted below:

$$Hc = Wc \times 1/Sc. \text{ (Eq. 1)}$$

Where:
Hc = Organic HAP content of the coating, kg (lb) of organic HAP emitted per kg (lb) coating solids used.

Wc = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

Sc = Mass fraction of coating solids, kg coating solids per kg coating, determined according to paragraph (b) of this section.

(e) Compliance demonstration. The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to section A.V.2.a. The permittee must keep all records required by 40 CFR

63.4530 and 40 CFR 63.4531. As part of the notification of compliance status required in 40 CFR 63.4510, the permittee must identify the coating operation(s) for which the permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.4490, and the permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in section A.V.2.a.

iii. Emission Rate Without Add-on Controls Option - Compliance may be based upon the following equations:

(a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in 40 CFR 63.4541(a) as specified in section A.V.2.a.i.

(b) Determine the mass fraction of coating solids. Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in 40 CFR 63.4541(b) as specified in section A.V.2.a.ii.

(c) Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 40 CFR 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 and other such information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the Ohio EPA that the formulation data are correct. If permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place

of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(e) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

He = A + B + C - Rw. (Eq. 1)
Where:
He = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

Rw = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to section A.V.2.b.iv.(4). (The permittee may assign a value of zero to RW if the permittee does not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

A = summation of (Volc,i) x (Dc,i) x (Wc,i), when i = 1 through m.

Where:
A = Total mass of organic HAP in the coatings used during the month, kg.

Volc,i = Total volume of coating, i, used during the month, liters.

Dc,i = Density of coating, i, kg coating per liter coating.

Wc,i = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to this subpart.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

B = summation of (Volt,j) x (Dt,j) x (Wt,j) when j = 1 through n. (Eq. 1B)
Where:
B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Volt,j = Total volume of thinner and/or other additive, j, used during the month, liters.

Dt,j = Density of thinner and/or other additive, j, kg per liter.

Wt,j = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in 40 CFR 63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to 40 CFR Part 63 Subpart PPPP.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

C = the summation of (Vols,k) x (Ds,k) x (Ws,k) when k = 1 through p. (Eq. 1C)

Where:
C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vols,k = Total volume of cleaning material, k, used during the month, liters.

Ds,k = Density of cleaning material, k, kg per liter.

Ws,k = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a

hazardous waste TSDF in Equation 1 of this section, then the permittee must determine the mass according to sections A.V.2.b.v.(e)(4)(a) through (d).

(a) The permittee may only include waste materials in the determination that are generated by coating operations in the affected source for which the permittee uses Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. The permittee may not include organic HAP contained in wastewater.

(b) The permittee must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in the determination of any waste materials sent to a TSDF during a month if the permitee has already included them in the amount collected and stored during that month or a previous month.

(c) Determine the total mass of organic HAP contained in the waste materials specified in section A.V.2.b.v.(e)(4)(b).

(d) The permittee must document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in 40 CFR 63.4530(g). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(5) Calculate the total mass of coating solids used. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of this section:

Mst = the summation of (Volc,i) x (Dc,i) x (Ms,i) when i = 1 through m (Eq. 2).

Where:
Mst = Total mass of coating solids used during the month, kg.

Volc,i = Total volume of coating, i, used during the month, liters.

Dc,i = Density of coating, i, kgs per liter coating, determined according to 40 CFR 63.4551(c).
Ms,i = Mass fraction of coating solids for coating, i, kgs solids per kg coating, determined according to 40 CFR 63.4541(b).

m = Number of coatings used during the month.

Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using Equation 3 of this section:

Hyr = [the summation of He when y = 1 through n]
x 1/[the summation of Mst when y = 1 through n] (Eq. 3).
Where:
Hyr = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

He = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

Mst = Total mass of coating solids used during month, y, kg, as calculated by Equation 2 of this section.

y = Identifier for months.
n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Coating line for plastic parts		Compliance with the Air Toxic Policy as specified in Sections B.III.1. and B.III

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling the federally regulated pollutants, i.e. xylene, a hazardous air pollutant (HAP), from the paint spray operation, or other pollutants from any other affected (regulated operations, i.e. cleanup operations) 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