



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

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

**RE: FINAL PERMIT TO INSTALL  
WOOD COUNTY  
Application No: 03-11229**

**CERTIFIED MAIL**

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

**DATE: 5/3/00**

Cooper Engineered Products  
Heather Beery  
1175 N Main St  
Bowling Green, OH 43402

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 5/3/00  
Effective Date: 5/3/00**

**FINAL PERMIT TO INSTALL 03-11229**

Application Number: 03-11229  
APS Premise Number: 0387020045  
Permit Fee: **\$1200**  
Name of Facility: Cooper Engineered Products  
Person to Contact: Heather Beery  
Address: 1175 N Main St  
Bowling Green, OH 43402

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1175 N. Main St.  
Bowling Green, Ohio**

Description of proposed emissions unit(s):  
**Flock line 1, flock line 2, and flock line 3 modifications.**

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 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

## **6. General Requirements**

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

## **7. Fees**

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

## 8. Federal and State Enforceability

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

## 9. Compliance Requirements

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

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

#### **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

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

**4. Air Pollution Nuisance**

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

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**6. Construction of New Sources(s)**

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

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

**7. Public Disclosure**

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

**8. Applicability**

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

**9. Best Available Technology**

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

**10. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
<b>PE</b>	<b>1.32</b>
<b>OC</b>	<b>24.96</b>

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. The permittee shall continue to investigate and research the feasibility of utilizing either (1) non-photochemically reactive adhesives or (2) for photochemically reactive adhesives, adhesives with a VOC contents less than 3.60 lbs VOC/gallon in flock lines #'s 1 through 3. This investigation and research requirement shall expire two years after the final issuance of this permit. This permittee shall submit detailed reports on the progress of their research to develop non-photochemically reactive or low VOC adhesives. These reports shall include the following information:
  - a. The name, contact name and telephone number of the supplier contacted for compliant adhesives.
  - b. The adhesive name and ID for any adhesive that was investigated for potential use.
  - c. A description of any trials conducted including the date, amount of adhesive used and duration of the trial.
  - d. A discussion of the results of the trial. This should include a description of the reason(s) why any adhesive failed.
  - e. A date when any approved adhesive was put into production.

These reports shall be submitted to the Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402 and to U.S. EPA, Region V, Permits and Grants Section, Air Programs Branch, (5AR-18J), 77 West Jackson Boulevard, Chicago, IL 60604. The reports shall be submitted annually. The first report shall be due one year from the date the final permit is issued and the final report shall be due two years from the date the final permit is issued.

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

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05, the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Xylene (R008, P014)  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 1.5  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 393  
MAGLC (ug/m3): 10,333

MAGLC (ug/m3) using 4 (TLV) where  $x = 24$  hours;  $y = 7$  days  
(x)(y)

MEK (R008, P014)  
TLV (ug/m3): 584,000  
Maximum Hourly Emission Rate (lbs/hr): 1.5  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 350  
MAGLC (ug/m3): 13,904

MAGLC (ug/m3) using 4 (TLV) where  $x = 24$  hours;  $y = 7$  days  
(x)(y)

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 1, hot air cure oven number 2 and cooling conveyor	OAC Rule 3745-21-07(G)(9)(g)	The combined OC emissions from liquid organic materials used in R008 and P014 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.
		The total OC emissions from liquid organic materials used in R008 and P014 shall not exceed 8.32 tons/year, based upon a rolling 12 month summation.
		See term (A)(I)(2)(a).
	OAC Rule 3745-31-05	Compliance with the emission limits and terms and conditions of this permit.
		See additional Special Terms and Conditions.

**2. Additional Terms and Conditions**

- 2.a While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units R008 and P014 flock lines #1, shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

## II. Operational Restrictions

1. The combined emissions of organic compounds from liquid organic materials used in Flock Line #1 emissions units R008 & P014, shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

## III. Monitoring and/or Recordkeeping Requirements

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #1 emissions units R008 & P014 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;

- d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
- e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
- f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]

2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #1 emissions units R008 & P014:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.
4. See term Part I (A)(1)(b).

#### **IV. Reporting Requirements**

See term Part I (A)(1)(c).

#### **V. Testing Requirements**

##### **1. OC Content**

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

##### **2. VOC Content**

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

4. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 1, hot air cure oven number 2 and cooling conveyor	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 2, hot air cure oven number 2 and cooling conveyor	OAC rule 3745-21-07(G)(9)(g)	<p>The combined OC emissions from liquid organic materials used in R011 and P018 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.</p> <p>The total OC emissions from liquid organic materials used in R011 and P018 shall not exceed 8.32 tons/year, based upon a rolling 12 month summation.</p> <p>See term (A)(I)(2)(a).</p>
	OAC 3745-31-05	<p>Compliance with the emission limits and terms and conditions of this permit.</p> <p>See additional Special Terms and Conditions.</p>

**2. Additional Terms and Conditions**

- 2.a While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units R011 and P018, flock lines #2, shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

**II. Operational Restrictions**

1. The combined emissions of organic compounds from liquid organic materials used in Flock Line #2 emissions units R011 & P018 shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

**III. Monitoring and/or Recordkeeping Requirements**

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #2 emissions units R011 & P018 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;

- d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
- e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
- f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]

2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #2 emissions units R011 & P018:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.
4. See term Part I (A)(1)(b).

#### **IV. Reporting Requirements**

See term Part I (A)(1)(c).

#### **V. Testing Requirements**

##### 1. OC Content

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

##### 2. VOC Content

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

4. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 2, hot air cure oven number 2 and cooling conveyor	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 3, hot air cure oven number 2 and cooling conveyor	OAC rule 3745-21-07(G)(9)(g)	The combined OC emissions from liquid organic materials used in R012 and P021 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.
	OAC 3745-31-05	The total OC emissions from liquid organic materials used in R012 and P021 shall not exceed 8.32 tons/year, based upon a rolling 12 month summation.
		See term (A)(I)(2)(a).
		Compliance with the emission limits and terms and conditions of this permit.
		See additional Special Terms and Conditions.

**2. Additional Terms and Conditions**

- 2.a While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units R012, and P021, flock lines #3, shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

## II. Operational Restrictions

1. The combined emissions of organic compounds from liquid organic materials used in Flock Line #3 emissions units R012 & P021 shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

## III. Monitoring and/or Recordkeeping Requirements

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #3 emissions units R012 & P021 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;

- d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
- e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
- f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]

- 2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #3 emissions units R012 & P021:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
- 3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.
- 4. See term Part I (A)(1)(b).

#### **IV. Reporting Requirements**

See term Part I (A)(1)(c).

#### **V. Testing Requirements**

##### **1. OC Content**

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

##### **2. VOC Content**

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

4. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 3, hot air cure oven number 2 and cooling conveyor	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock Line Number 1, adhesive booth, drying conveyor, and flocking booth	OAC Rule 3745-21-07(G)(9)(g)	The combined OC emissions from liquid organic materials used in R008 and P014 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.
		The total OC emissions from liquid organic materials used in R008 and P014 shall not exceed 8.32 tons/year, based on a rolling 12 month summation.
		See (A)(I)(2)(b).
	OAC rule 3745-31-05	The PM emissions from the flocking booth shall not exceed 0.1 pound/hour, and 0.44 ton/year
		Compliance with the emission limits and terms and conditions of this permit.
	OAC Rule 3745-17-07	visible emissions shall not exceed twenty percent as a six minute average, except as provided by rule.
	OAC Rule 3745-17-11	See (A)(I)(2)(a).
		See additional terms and conditions.

**2. Additional Terms and Conditions**

- 2.a The emission limitations established under BAT are more stringent than those established under this rule.
- 2.b While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units R008 and P014, flock line #1 shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

**II. Operational Restrictions**

- 1. The combined emissions of organic compounds from liquid organic materials used in Flock Line #1 emissions units R008 & P014 shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

### III. Monitoring and/or Recordkeeping Requirements

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #1 emissions units R008 & P014 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;
  - d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
  - e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
  - f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]
2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #1 emissions units R008 & P014:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.

4. See term Part I (A)(1)(b).

#### IV. Reporting Requirements

See term Part I (A)(1)(c).

#### V. Testing Requirements

1. OC Content

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

2. VOC Content

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method

Visible emissions readings shall be performed using Method 9 of 40 CFR Part 60, Appendix A.

4. Emission Limitation:

0.1 pound per hour of PM emissions

Applicable Compliance Method

If required, an emission test shall be performed in accordance with OAC Rule 3745-17-03(B)(10) to demonstrate compliance with the allowable hourly particulate emission rate of 0.1 pound per hour.

5. Emission Limitation:

0.44 ton per year of PM emissions

Applicable Compliance Method

Compliance with the annual particulate emission limit of 0.44 ton per year shall be determined by multiplying the allowable PM emission rate of 0.1 pound per hour by the actual hours of operation during the calendar year, and dividing by 2000.

6. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

7. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock Line Number 1, adhesive booth, drying conveyor, and flocking booth	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 2, adhesive booth, drying conveyor and flocking booth	OAC 3745-21-07(G)(9)(g)	The combined OC emissions from liquid organic materials used in R011 and P018 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.  The total OC emissions from liquid organic materials used in R011 and P018 shall not exceed 8.32 tons/year, based on a rolling 12 month summation.  See (A)(I)(2)(b).
	OAC Rule 3745-31-05	The PM emissions from the flocking booth shall not exceed 0.1 pound/hour, and 0.44 ton/year  Compliance with the emission limits and terms and conditions of this permit.
	OAC Rule 3745-17-07	visible emissions shall not exceed twenty percent as a six minute average, except as provided by rule.
	OAC Rule 3745-17-11	See (A)(I)(2)(a).  See additional terms and conditions.

**2. Additional Terms and Conditions**

- 2.a** The emission limitations established under BAT are more stringent than those established under this rule.
  
- 2.b** While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units, R011 and P018, flock lines #2, shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

**II. Operational Restrictions**

- 1. The combined emissions of organic compounds from liquid organic materials used Flock Line #2 emissions units R011 & P018 shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

### III. Monitoring and/or Recordkeeping Requirements

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #2 emissions units R011 & P018 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;
  - d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
  - e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
  - f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]

2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #2 emissions units R011 & P018:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.

4. See term Part I (A)(1)(b).

#### IV. Reporting Requirements

1. See term Part I (A)(1)(c).

#### V. Testing Requirements

1. OC Content

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

2. VOC Content

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

20% opacity as a six-minute average

##### Applicable Compliance Method

Visible emissions readings shall be performed using Method 9 of 40 CFR Part 60, Appendix A.

4. Emission Limitation:

0.1 pound per hour of PM emissions

##### Applicable Compliance Method

If required, an emission test shall be performed in accordance with OAC Rule 3745-17-03(B)(10) to demonstrate compliance with the allowable hourly particulate emission rate of 0.1 pound per hour.

5. Emission Limitation:

0.44 ton per year of PM emissions

Applicable Compliance Method

Compliance with the annual particulate emission limit of 0.44 ton per year shall be determined by multiplying the allowable PM emission rate of 0.1 pound per hour by the actual hours of operation during the calendar year, and dividing by 2000.

6. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

7. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock line Number 2, adhesive booth, drying conveyor and flocking booth	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock Line Number 3, adhesive booth, drying conveyor, and flocking booth	OAC rule 3745-21-07(G)(9)(g)	The combined OC emissions from liquid organic materials used in R012 and P021 shall not exceed 86.64 pounds/day on days when only non- photochemically reactive materials are employed.  The total OC emissions from liquid organic materials used in R012 and P021 shall not exceed 8.32 tons/year, based on a rolling 12 month summation.  See term (A)(I)(2)(b).
	OAC Rule 3745-31-05	The PM emissions from the flocking booth shall not exceed 0.1 pound/hour, and 0.44 ton/year  Compliance with the emission limits and terms and conditions of this permit.
	OAC Rule 3745-17-07	visible emissions shall not exceed twenty percent as a six minute average, except as provided by rule.
	OAC Rule 3745-17-11	See (A)(I)(2)(a).  See additional terms and conditions.

**2. Additional Terms and Conditions**

- 2.a** The emission limitations established under BAT are more stringent than those established under this rule.
  
- 2.b.** While utilizing photochemically reactive coatings, the VOC content of each adhesive employed in emissions units R012 and P021, flock lines #3, shall not exceed 3.60 lbs VOC/gallon on an “as applied” basis. Once a VOC adhesive with a VOC content less than 3.60 lbs VOC/gallon has been approved for use in production under the study discussed in terms (Part II)(A)(1), that coating shall be used instead.

**II. Operational Restrictions**

- 1. The combined emissions of organic compounds from liquid organic materials used in Flock Line #3 emissions units R012 & P021 shall not exceed 8.32 tons per year, each, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first calendar 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for each Flock Line:

Month(s)	Maximum Allowable Cumulative Emissions of Organic Compounds from the used of Liquid Organic Materials (Tons)
1	1.34
1-2	2.68
1-3	4.02
1-4	5.36
1-5	6.70
1-6	8.04
1-7	8.32
1-8	8.32
1-9	8.32
1-10	8.32
1-11	8.32
1-12	8.32

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

### III. Monitoring and/or Recordkeeping Requirements

1. In order to determine compliance with the limit of 86.64 pounds of organic compounds per day, the permittee shall collect and record the following information for Flock Line #3 emissions units R012 & P021 each day:
  - a. the company identification for each coating material employed;
  - b. a determination of whether or not the coating is photochemically reactive;
  - c. the number of gallons of each non photochemically reactive coating material employed;
  - d. the organic compound content of each non photochemically reactive coating material, in pounds per gallon;
  - e. the organic compound emission rate for each non photochemically reactive coating (assuming all solvent in the coating is emitted), in pounds per day;
  - f. the total organic compound emission rate for all non photochemically reactive coatings, in pounds per day;

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.]
2. In order to determine compliance with the monthly organic compound emission limits and the annual emission limit of 8.32 tons of organic compounds per rolling 12 month period, the permittee shall collect and record the following each month for Flock Line #3 emissions units R012 & P021:
  - a. the total OC emissions from the use of liquid organic materials for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition (A)(II)(1)); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition (A)(II)).
3. In order to demonstrate compliance with the 3.60 pounds of VOC per gallon limit, the permittee shall collect and record the volatile organic compound content of each photochemically reactive coating material, in pounds per gallon.

4. See term Part I (A)(1)(b).

#### IV. Reporting Requirements

See term Part I (A)(1)(c).

#### V. Testing Requirements

1. OC Content

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink and operating hours per day for each emissions unit. Formulation data or U.S. EPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

2. VOC Content

Compliance shall be demonstrated through test methods and procedures listed in OAC rule 3745-21-10(B). U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.”

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method

Visible emissions readings shall be performed using Method 9 of 40 CFR Part 60, Appendix A.

4. Emission Limitation:

0.1 pound per hour of PM emissions

Applicable Compliance Method

If required, an emission test shall be performed in accordance with OAC Rule 3745-17-03(B)(10) to demonstrate compliance with the allowable hourly particulate emission rate of 0.1 pound per hour.

5. Emission Limitation:

0.44 ton per year of PM emissions

Applicable Compliance Method

Compliance with the annual particulate emission limit of 0.44 ton per year shall be determined by multiplying the allowable PM emission rate of 0.1 pound per hour by the actual hours of operation during the calendar year, and dividing by 2000.

6. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method

Compliance with the OC emission limitation of 86.64 pounds OC/day shall be determined by the recordkeeping requirements in term (A)(III)(1).

7. Emission Limitation:

8.32 tons/rolling 12-month period

Applicable Compliance Method

Compliance with the OC emission limitation of 8.32 tons/rolling 12-month period shall be determined by the recordkeeping requirements in term (A)(III)(2).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flock Line Number 3, adhesive booth, drying conveyor, and flocking booth	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION Flock line Number 1, hot air cure oven number 2 and cooling conveyor

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID P018

EMISSIONS UNIT DESCRIPTION Flock line Number 3, hot air cure oven number 2 and cooling conveyor

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID P021

EMISSIONS UNIT DESCRIPTION Flock line Number 1, hot air cure oven number 2 and cooling conveyor

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

**TOXIC AIR CONTAMINANTS**

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IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID R008

EMISSIONS UNIT DESCRIPTION Flock Line Number 1, adhesive booth, drying conveyor, and flocking booth

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.1 lbs/hr	0.44	0.1 lbs/hr	0.44
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID R011

EMISSIONS UNIT DESCRIPTION Flock line Number 2, adhesive booth, drying conveyor and flocking booth

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.1 lbs/hr	0.44	0.1 lbs/hr	0.44
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

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AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11229

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Flock line 1, flock line 2, and flock line 3 modifications CITY/TWP Bowling Green

SIC CODE 2679 SCC CODE EMISSIONS UNIT ID R012

EMISSIONS UNIT DESCRIPTION Flock Line Number 3, adhesive booth, drying conveyor, and flocking booth

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.1 lbs/hr	0.44	0.1 lbs/hr	0.44
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	86.64 lbs/day	8.32	86.64 lbs/day	8.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Compliance with the terms and conditions in this permit

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IDENTIFY THE AIR CONTAMINANTS: Xylene and MEK