



State of Ohio Environmental Protection Agency

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**RE: FINAL PERMIT TO INSTALL MODIFICATION**

**CERTIFIED MAIL**

**DARKE COUNTY**

**Application No: 08-04088**

**Fac ID: 0819100218**

**DATE: 3/9/2006**

Florida Production Engineering  
Thom Eberwein  
1855 State Rte 121 N  
New Madison, OH 45346

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04088**

Application Number: 08-04088  
Facility ID: 0819100218  
Permit Fee: **\$100**  
Name of Facility: Florida Production Engineering  
Person to Contact: Thom Eberwein  
Address: 1855 State Rte 121 N  
New Madison, OH 45346

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1855 State Rte 121 N**  
**New Madison, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to increase VOC content for coatings applied in K003.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. 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 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 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. Records Retention Requirements**

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.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. 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.

**8. 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.

**9. 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.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. 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.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

#### **14. 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.

#### **15. 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.

### **B. 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>
OC	25.29
Single HAP	9.9
Combined HAPs	24.9

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. 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>
K003 - Bezel Paint Line: 2 color booths, 3 deco booths, oven, parts washer and drying oven with thermal oxidizer *modification	OAC rule 3745-31-05 (A)(3)	5.77 lbs/hr organic compounds, including cleanup, 138.57 lbs/day organic compounds, including cleanup, 25.29 TPY organic compounds, including cleanup
		The volatile organic compound (VOC) content of all coatings employed in the bezel line, K003, shall not exceed, at a maximum, 6.66 pounds VOC per gallon of coating applied in the color booths and 1.78 lbs VOC per gallon applied in the deco booths.
	OAC 3745-35-07 (B)	Reference A.2.a.
	OAC 3745-21-07 (G)(9)	Reference A.2.b. and A.2.d.
	OAC rule 3745-21-07(G)(2)	Reference A.2.c and A.2.d.

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility (including, but not limited to emissions units K001, K003, P001 and K004) shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.
- 2.b Compliance shall be demonstrated through the use of non-photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5) in the three deco booths that are part of this emissions unit .

- 2.c Compliance shall be demonstrated by achieving greater than 85 percent by weight overall emissions reduction in the two color booths that are part of this emissions unit.
- 2.d The limit based on this rule is equivalent to the limit established pursuant to OAC rule 3745-31-05 (A)(3).

**B. Operational Restrictions**

- 1. The organic compound (OC) emissions from the two color booths and one of the three deco booths associated with the bezel paint line and identified as emissions unit K003, shall be controlled through the application of a common compact thermal oxidizer (CTO), operating at a destruction efficiency of at least 95 percent, or the total organic compound concentration at the outlet shall be less than 15 parts per million by volume as propane on a dry basis, which ever is less stringent.

The two Color Coat Booths shall be equipped with a permanent total enclosure with 100 percent capture efficiency.

The Deco Booth No. 1 and the mask washers associated with emissions unit K003, shall have a capture efficiency of at least 80 percent and shall be vented to the CTO.

The overall capture and control efficiency of the emissions control system for the Bezel Line, K003, shall be at least 64 percent.

- 2. The common CTO associated with this emissions unit K003 is shared with emissions unit K001 permitted under PTI 08-2646, issued on June 1, 1993.
- 3. The aggregate organic compound emissions from the CTO, including those from K001, shall not exceed: 9.66 pounds/hr, 231.98 pounds/day, 42.35 TPY.
- 4. The permittee shall not exceed the following application coating rates in emissions unit K003:

<u>Coating Identification</u>	<u>Gallons/Month</u>
Color Coat (first booth)	3471
Deco Coat (second booth)	2777

- 5. The 2 -Color Booths and the oven associated with emissions unit K003 shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. Any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emitting point;

- b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
- c. The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inches of water. The direction of air through all NDOs shall be into the enclosure;
- d. All access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c), and shall be closed during routine operation; and
- e. All VOC emissions must be captured and contained for discharge through the CTO control device.

By satisfying the criteria above for establishing permanent total enclosure, the total organic capture efficiency shall be assumed to be 100%.

Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for a discharge through a control device.

Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- 6. The permanent total enclosure on the 2 -Color Booths and the oven associated with emissions unit K003, shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as a three hour average, whenever the emissions unit is in operation.
- 7. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation.
- 8. The VOC content of the coatings applied in the 3-Deco Booths shall not exceed 1.78 lbs of VOC/gallon.

### **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and

maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measures and records the pressure inside and outside the permanent total enclosure on the 2 -Color Booths and the oven associated with emissions unit K003. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three hour average.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

In lieu of pressure differential monitoring and recording, the permittee can demonstrate that the permanent total enclosure associated with this emissions unit, meets the criteria established in Method 204 using an alternative method. As such, the permittee is required to demonstrate that the permanent total enclosure is not compromised, under normal plant conditions, when the emissions unit is in operation, i.e., the air flow through the permanent total enclosure to the control device is always maintained under negative pressure, even when all additional egress points (non-natural draft openings) which could affect the permanent total enclosure, are opened.

In accordance with the alternative method, the permittee is required to continuously monitor and record the revolutions per minute (RPM) of the fan that maintains flow to the thermal oxidizer from the controlled coating operations, at or above the RPM established during the most recent performance test that demonstrated compliance with Method 204.

4. The permittee shall collect and record the following information each month for the coating operation, K003.
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The total uncontrolled organic compound emission rate for all coatings and cleanup materials, in pounds per month.
  - e. The calculated, controlled organic compound emission rate for all coatings and cleanup materials, in pounds per month. The controlled organic compound emission rate shall be calculated using the overall control efficiency as determined from the most recent performance test that demonstrated that the emissions unit was in compliance. .
  - f. The total number of days the emissions unit was in operation.
  - g. The average daily controlled organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per day (average).

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

5. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units K001, K003, P001 and K004).
  - a. The name and identification number of each coating, as applied.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual Hap contents from (b)].
  - d. The number of gallons of each coating employed.
  - e. The name and identification of each cleanup and solvent wipe material employed.
  - f. The individual HAP content for each HAP of each cleanup and solvent wipe material, in pounds of individual HAP per gallon of material, as applied.

- g. The total combined HAP content of each cleanup and solvent wipe material, in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (f)].
- h. The number of gallons of each cleanup and solvent wipe material employed.
- i. The total individual HAP emissions for each HAP from all coatings, solvent wipe and cleanup materials employed, in pounds or tons per month.
- j. The total combined HAP emissions from all coatings, solvent wipe and cleanup materials employed, in pounds or tons per month.
- k. The cumulative monthly total for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter of the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons.
- l. The cumulative monthly total for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter of the total combined HAPs from all coatings and cleanup materials employed, in pounds or tons.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

#### **D. Reporting Requirements**

1. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the combustion gases from the thermal oxidizer does not comply with the temperature limitation specified above.

The deviation (excursion) report shall include the following information:

- a. The date of the excursion.
  - b. The time interval over which the excursion occurred.
  - c. The temperature values during the excursion.
  - d. The cause(s) for the excursion.
  - e. The corrective action which has been or will be taken to prevent similar excursions in the future.
2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the facility wide HAP emission limitations.

3. The permittee shall submit semi-annual which summarizes the monthly information required in Section C.4.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all three hour blocks of time during which the permanent total enclosure, on the 2 -Color Booths and the oven associated with emissions unit K003, was not maintained at the minimum pressure differential of 0.007 inches of water, as a three hour average.

In lieu of pressure differential exceedance reporting, the permittee shall submit fan RPM deviation (excursion) reports that identify when the fan RPM is less than that established in the most recent performance test demonstrating compliance.

5. The permittee shall submit all reports required by this permit in accordance with general term and condition A.2.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation-  
5.77 lbs/hr organic compounds, including cleanup  
  
Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the record keeping in Section C.4.
  - b. Emission Limitation-  
138.57 lbs/day organic compounds, including cleanup  
  
Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the record keeping in Section C.4.
  - c. Emission Limitation-  
25.29 TPY organic compounds, including cleanup  
  
Applicable Compliance Method-  
  
Compliance with this emissions limitation shall be based upon record keeping in Section C.4. and shall be the sum of the 12-monthly limits divided by 2000 lbs/ton.
  - d. Emission Limitation-  
The volatile organic compound (VOC) content of all coatings employed in the color booths of the bezel line, K003, shall not exceed, at a maximum, 6.66 pounds VOC per gallon of coating applied.

Applicable Compliance Method-

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings.

- e. Compliance with the facility wide HAP emission limitations in Section A.2.a. shall be demonstrated by the record keeping required in Section C.5. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials employed.
- f. Emission Limitation-  
The volatile organic compound (VOC) content of all coatings employed in the deco booths of the bezel line, K003, shall not exceed, at a maximum, 1.78 pounds VOC per gallon of coating applied.

Applicable Compliance Method-

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings.

- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The last emissions showing was performed on this emissions unit in April 2004. Future emissions testing requirements will be established in the permits -to-operate(PTOs) for emissions units K001 and K003.
  - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitations for organic compounds contained within the permit. The permittee may choose to comply with the ninety-five percent destruction efficiency or the total organic compound concentration at the outlet of less than 15 parts per million by volume as propane on a dry basis, which ever is the less stringent requirement listed in the permit for the thermal oxidizer.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for organic compounds: Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may

approve the use of the alternative if such approval does not contravene any other applicable requirement.)

In order to determine if the enclosure meets the PTE criteria established in Reference Method 204, the permittee may opt to perform an additional demonstration to show that the PTE could not be compromised under normal plant conditions, when the emissions unit was in operation i.e., the air flow through the PTE to the control device was always maintained under negative pressure, even when all additional egress points (non-natural draft openings) which could affect the PTE were opened.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”

- e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**F. Miscellaneous Requirements**

1. \*This modification represents the addition of a third color booth to the previously permitted bezel line authorized under PTI 08-3581 issued September 18, 1996. With this PTI 08-4088, the allowable organic compound emission rates will increase +3.08 lbs/hr, +73.94 lbs/day and +14.85 TPY over the allowable emission limitations in PTI 08-3581, issued on September 18, 1996.
2. A second administrative modification of the final PTI issued February 24, 2000. This PTI modification was completed to increase the allowable VOC content of the coatings applied in the color booths to 6.66 lbs VOC/gallon from 1.78 lbs VOC/gallon to accommodate a temporary change in the type of plastic parts coated and to identify that the two color booths are now employing photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), and therefore now are subject to OAC rule 3745-21-07 (G)(2) requirements. The permittee per term A.2.c has chosen to comply with OAC rule 3745-21-07 (G)(2) requirements via achieving greater than 85 percent by weight overall OC emissions reduction from the two color booths. The PTI was also corrected to reflect the final installation of only two color booths instead of the three that were included in the original PTI. An additional option for compliance demonstration was also added for the thermal oxidizer, the thermal oxidizer is now required to achieve 95 percent destruction or achieve an outlet concentration of 15 ppm carbon (measured as propane) on a volumetric basis.
3. 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 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (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 Industrial Source Complex model (ISCST3) 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 the "worse case" each pollutant(s):

Pollutant: **Isopropyl Alcohol**

TLV (ug/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 5.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.00618

MAGLC (ug/m3): 0.0234

Pollutant: **Butyl Cellosolve**

TLV (ug/m3): 121

Maximum Hourly Emission Rate (lbs/hr): 2.70

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.0029

MAGLC (ug/m3): 0.0029

Pollutant: **Acetone**

TLV (ug/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 5.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.00618

MAGLC (ug/m3): 0.0424

Pollutant: **Triethylamine**

TLV (ug/m3): 41

Maximum Hourly Emission Rate (lbs/hr): 0.91

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.0001

MAGLC (ug/m3): 0.0001

Pollutant: **Xylene**

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 5.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.00618

MAGLC (ug/m3): 0.0103

Pollutant: **Glycol Ether DPM**

TLV (ug/m3): 606

Maximum Hourly Emission Rate (lbs/hr): 5.78

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 0.00618

MAGLC (ug/m3): 0.0144

4. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.)
5. 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.