



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
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Columbus, OH 43215

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P.O. Box 1049
Columbus, OH 43216-1049

11/18/03

**RE: Proposed Title V Chapter 3745-77 Permit
03-02-00-0166
DTR Industries Incorporated**

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for DTR Industries Incorporated, has been created in Ohio EPA's State Air Resources System (STARS) on 11/18/03, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,


Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 11/18/03

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-02-00-0166 to:
DTR Industries Incorporated
320 Snider Road
Bluffton, OH 45817

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Compliance Status. Rows include units K004 through K041, detailing activities like surface coating and dipping for various metal parts.

Coatings.

P037 (BB240 Banbury Mixer #1 (S17-1))
Rubber Compound Mixer: Particulate Air Emission
Sources controlled by a Baghouse.

P043 (Hose Marking Machine #1 (H70))
Ink Printing Operation For EFI Rubber Hose Using
Transfer Head Process.

P046 (Glycol Dip Tank No.1 w/(2) Steam Cleaning
Systems(B309))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P047 (Glycol Dip Tank No.2 w/(2) Steam Cleaning
Systems(B329))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P049 (Glycol Dip Tank No.3 w/(1) Steam Cleaning
System (B462))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P050 (Glycol Dip Tank No.4 w/(1) Steam Cleaning
System (B464))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P051 (Glycol Dip Tank No.5 w/(1) Steam Cleaning

System (B486))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P052 (Glycol Dip Tank No.6 w/(1) Steam Cleaning
System (B505))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P053 (Glycol Dip Tank No.7 w/(1) Steam Cleaning
System (B507))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P059 (Submerged Assembling Machine (B552))
Glycol dip tank with (1) steam cleaning system.

P060 (Submerged Assembling Machine (B596))
Glycol dip tank with (1) steam cleaning system.

P061 (Joint Assembly Machine (A60))
MEK and Methanol blend is used as a cleaning and
insertion agent for rubber hose and metal joint

P064 (Banbury Mixer #2 (S040))
Rubber Compound Mixer: Particulate Air Emission
Sources controlled by a Baghouse.

P065 (Roll Mill #2 (S047))
Rubber Milling Machine: Particulate Air Emission
Sources controlled by a Baghouse.

P066 (Submerged Assembling Machine (B676))
Steam Cleaning Operation For Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P067 (Vacuum System (US46))
Particulate Matter Collection System for
Housekeeping Activities in Rubber Mixing Area

P068 (Carbon Dust Handling System (US54))
Particulate Matter Collection System for Four
Existing Dust Collectors

P069 (Auto-Handweigh System (S50/S51))
Particulate Matter Collection System for a Chemical
Weigh Station

P070 (Glycol Dip Tank (B815))
Steam Cleaning Operation for Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P071 (Glycol Dip Tank (B860))
Steam Cleaning Operation for Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

P072 (Glycol Dip Tank (B869))
Steam Cleaning Operation for Automotive Part
Manufacturing Which Has Ethylene Glycol
Emissions.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping and Reporting Requirements**

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. **Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. **Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local

air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31. (Authority for term: OAC rule 3745-77-07(A)(1))

20. 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. (Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. The following insignificant emissions units are located at this facility:

8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler U11 (B001)(PTI # 03-3537);
8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler U12 (B002)(PTI # 03-3537);
8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler U13 (B003)(PTI # 03-3537);
Rubber Compound Mixing Machine SD2 (P001)(PTI # 03-3475);
Twin Roll Rubber Mill with Butcher SD2 (P002)(PTI # 03-3475);
Hose Cutting & Marking Machinery A5 (P004)(PTI # 03-3475);
Hose Cleaning & Buffing Machinery A6 (P005)(PTI # 03-3475);
Metal Parts Assembly Machine A7 (P006)(PTI # 03-3475);
2.6 mmBtu/hr Natural Gas Fired Brazing Furnace #1 K12 (P008)(PTI # 03-3537);
50 mm. Plastic Extruder #1 H1 (P009)(PTI # 03-3503);
65 mm. Plastic Extruder #2 H11 (P010)(PTI # 03-3503);
Shot Blasting Machine with Baghouse B5 (P014)(PTI # 03-3758);
Hose Marking Machine H30 (P027)(PTI # 03-4406);
Wet Blast Machine No. 1 B60 (P029)(PTI # 03-4788);
Roll Mill #1 S26 (P038)(PTI # 03-5384);
Batch Off Machine S27 (P039)(PTI # 03-5384);
2.6 MMBTU/hr Natural Gas Fired Brazing Furnace #2 K13 (P040)(PTI # 03-5571);
Wet Blast Machine No. 2 B120 (P041)(PTI # 03-5667);
Aluminum Surface Treatment Line No.1 B190 (P042)(PTI # 03-6042);
Twin Wet Blast And Phosphating Line No. 3 B270 (P044)(PTI # 03-8544);
Automatic Chemical Weighing and Conveying System US20 (P062)(PTI # 03-13085); and
Automatic Carbon Weighing And Conveying System S37 (P063)(PTI # 03-13085).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Teflon Coating Operation w/ For Metal Molds B341-1,2 (Z050);
Teflon Baking Oven #1 W/ Scrubber System B342-1,2 (Z075);
Bead Shot Blast No. 1 w/ Dust Collector B169 (Z076);
Aluminum Surface Treatment Line No.2 B350 (Z077);
Twin Wet Blast And Phosphating Line No. 4 B351 (Z078);
Maxi Blast Shot Blast w/ Dust Collector US018 (Z079);
Teflon Baking Oven #2 W/ Scrubber System B625 (Z080);
Twin Wet Blast And Phosphating Line No. 5 B619 (Z081);

B. State Only Enforceable Section (continued)

LLTI #1 B7 (Z100);
LLTI #2 B8 (Z101);
MTI #2 B33 (Z104);
M6I #1 B37 (Z105);
M6I #2 B38 (Z106);
LLTI #5 B64 (Z109);
LLTI #6 B65 (Z110);
LLTI #7 B66 (Z111);
LLTI #8 B67 (Z112);
LLTI #9 B68 (Z113);
LLTI #10 B127 (Z119);
LLTI #11 B128 (Z120);
STI #6 B51 (Z123);
LLTI #3 B62 (Z124);
LLTI #4 B63 (Z125);
LLTI [Diff. #2] B126 (Z127);
LLTI #12 B129 (Z128);
LLTI #13 B202 (Z130);
LLTI #14 B203 (Z131);
LLTI #15 B204 (Z132);
LTI #1 B207 (Z133);
LTI #4 B220 (Z137);
LLTI #16 B225 (Z139);
LLTI #17 B226 (Z140);
LLTI #18 B227 (Z141);
LLTI #19 B228 (Z142);
LLTI #20 B229 (Z143);
STI #8 B273 (Z151);
LTI #5 B275 (Z152);
LTI #6 B276 (Z153);

B. State Only Enforceable Section (continued)

L6I #1 [I/B] B302 (Z160);
SSTI #7 [DIA] B303 (Z161);
SSTI #8 [DIA] B304 (Z162);
LLTI #21 B320 (Z163);
MTI #15 B383 (Z170);
STI-V(450) #1 B390 (Z171);
STI-V(450) #3 B392 (Z172);
STI-V(450) #4 B393 (Z173);
STI-V(450) #5 B394 (Z174);
STI-V(450) #6 B395 (Z175);
STI-V(450) #7 B396 (Z176);
STI-V(450) #8 B397 (Z177);
STI-V(450) #9 B398 (Z178);
STI B399 (Z179);
STI B399 (Z180);
STI B401 (Z181);
L6I #4 B437 (Z183);
L6I B435 (Z186);
STI B541 (Z187);
STI B543 (Z188);
STI B580 (Z189);
STI-450 B589 (Z190);
CCS/STI B642 (Z191);
LTI/STI B643 (Z192);
STI B644 (Z193);
LLTI B627 (Z194);
STI B577 (Z195);
STI B544 (Z196);
STI B426 (Z197);
STI B427 (Z198);
STI B391 (Z199);

Plastic Injection Molding Machine No. 3 B347 (Z202)
Process Oil Tanks With Heating & Delivery Systems S29 (Z226);
CO2 Rotary Welder #1 B57 (Z250);
Projection Welding Machine No. 1 B56 (Z254);
Projection Welding Machine No. 2 B61 (Z255);
Projection Welding Machine No. 3 B245 (Z257);
CO2 Rotary Welding Machine C001 (Z259);
Seal Tester for Welders C060 (Z264);
CO2 Welder C072 (Z265);
CO2 Welder C073 (Z266);
Auto Solder #2 C075 (Z267);
Bolt Caulking Machine B615 (Z268);
Bolt Caulking B617 (Z269);
Bolt Caulking B616 (Z270);
Soldering Machine #1 (C059) (Z271);

B. State Only Enforceable Section (continued)

Strut Mount Inner Cutter No. 2 B105 (Z302);
Strut Mount Inner Cutter No. 3 B106 (Z303);
Pipe Cutting Machine No. 3 C009 (Z307);
Pipe Finishing Machine No. 3 C010 (Z308);
Pipe Cutting Machine No. 4 C012 (Z309);
Pipe Finishing Machine No. 4 C013 (Z310);
Inner Ring Slitter Machine No. 1 C015 (Z311);
Inner Ring Slitter Machine No. 2 C016 (Z312);
E/M Aluminum Cutting Machine No. 1- Line 1 C017 (Z313);
E/M Aluminum Cutting Machine No. 2 - Line 1 C018 (Z314);
E/M Aluminum Tapping Machine C019 (Z315);
M/M Aluminum Cutting Machine #1 Lathe: # 2 Line-C020 (Z316);
M/M Aluminum Cutting Machine #2 Lathe: # 2 Line-C021 (Z317);
M/M Aluminum Cutting Machine #1 Lathe: # 3 Line-C022 (Z318);
M/M Aluminum Cutting Machine #2 Lathe: # 3 Line-C023 (Z319);
Aluminum Cutting Machine #1 Lathe: # 4 Line-C024 (Z320);
Aluminum Cutting Machine #2 Lathe: # 4 Line-C025 (Z321);
CNC Machine No. 1 [FM-80] C045 (Z322);
CNC Machine No. 2 [FM-80] C046 (Z323);
Majak CNC Lathe Cutting and Flange Press C067 (Z324);
Majak CNC Lathe Cutting and Flange Press C068 (Z325);
Muratec NC Lathe (Z326);
Muratec CNC Drill and Tap C047 (Z327);
STI B581 (Z350);
STI B582 (Z351);
Mold Preheat Oven US031 (Z352);
STI-450 B584 (Z353);
STI B573 (Z354);
STI-450 B548 (Z355);
STI B545 (Z356);
LLTI B628 (Z357);

B. State Only Enforceable Section (continued)

Dryer #4 B513 (Z400);
Dryer #5 B514 (Z401);
Dryer #3 B467 (Z402);
Dryer #1 B311 (Z403);
Dryer #2 B333 (Z404);
Dryer #6 B554 (Z405);
Dryer #7 B601 (Z406);
Rubber Hose Autoclave Curing No. 1 H16 (Z450);
Rubber Hose Autoclave Curing No. 2 H97 (Z451);
50 mm diameter Rubber Extruder No. 1 H5-1 (Z452);
50 mm diameter Rubber Extruder No. 2 H6-1 (Z453);
60 mm diameter Rubber Extruder No. 1 H10-1 (Z454);
Hopper Dryer H20 (Z455);
Adhesive Dispensing Units 1 & 2 H32-1,2 (Z456);
Tube Winding Machine w/Zinc Stearate Application H36 (Z457);
Hose Heating Oven for QC H55 (Z458);
Autoclave No. 3 H156 (Z459);
60mm Rubber Hose Extruder H89 (Z461);
Hose Powder Applicator H94 (Z462);
Inner Cover Rubber Hose Extruder H100 (Z463);
Outer Cover Rubber Hose Extruder H101 (Z464);
Hose Heating Oven No. 3 H102 (Z465);
Hose Cleaning Machine (Aqueous) No.1 H105 (Z466);
Steam Oven For Curing Rubber Hose H106 (Z467);
Cover Extruder Vacuum H73 (Z468);
Plastic Cover Extruder H74 (Z469);
Cutting/Stamping Machine No. 4 H129 (Z476);
Cutting/Stamping Machine No. 6 H150 (Z478);
Powder Application Unit H152 (Z481);
Heat Treatment Machine No. 3 A29 (Z483);
Heat Treatment Machine No. 5 A61 (Z484);
Plastic Tube Heat Treatment Machine No. 2 A44 (Z485);
Pre-Heating Machine No. 2 A43 (Z486);
Cut/Stamp Machine H169 (Z487);
Cut/Stamp Machine H146 (Z488);
Dryer No. 3 A71 (Z489);
Heat Treatment Machine A9 (Z490);
Dryer No. 1 A11 (Z491);
Dryer W7 (Z492);
Dryer W3-1 (Z493);
Hose Heating Oven No. 5 H211 (Z494);
Oven A2-2 (Z495);
90 mm Rubber Extruder H183 (Z496);
70 mm Rubber Extruder H184 (Z497);
Plastic Resin Recycle System H209 (Z498);
Pre-Heating Oven H48 (Z499);

B. State Only Enforceable Section (continued)

Outer Cover 90mm Plastic Extruder (Z550);
20 mm Plastic Extruder H133 (Z551);
40 mm Plastic Extruder H134 (Z552);
65 mm Plastic Extruder H135 (Z553);
Spot Welder K8 (Z575);
Spot Welder K43 (Z576);
Spot Welder K42 (Z577);
Steel Cutting Machine K18 (Z600);
CNC Precision Lathe No. 1-1 K1,1-1 (Z602);
CNC Precision Lathe No. 1-2 K1,1-2 (Z603);
CNC Precision Lathe No. 1-3 K1,1-3 (Z604);
CNC Precision Lathe No. 1-4 K1,1-4 (Z605);
CNC Precision Lathe No. 2-1 K1,2-1 (Z606);
CNC Precision Lathe No. 2-2 K1,2-2 (Z607);
CNC Precision Lathe No. 2-3 K1,2-3 (Z608);
CNC Precision Lathe No. 2-4 K1,2-4 (Z609);
CNC Precision Lathe No. 3-1 K1,3-1 (Z610);
CNC Precision Lathe No. 3-2 K1,3-2 (Z611);
CNC Precision Lathe No. 3-3 K1,3-3 (Z612);
CNC Precision Lathe No. 3-4 K1,3-4 (Z613);
CNC Precision Lathe No. 4-1 K1,4-1 (Z614);
CNC Precision Lathe No. 4-2 K1,4-2 (Z615);
CNC Precision Lathe No. 4-3 K1,4-3 (Z616);
CNC Precision Lathe No. 4-4 K1,4-4 (Z617);
CNC Precision Lathe No. 5-1 K2,5-1 (Z618);
CNC Precision Lathe No. 5-2 K2,5-2 (Z619);
CNC Precision Lathe No. 5-3 K2,5-3 (Z620);
CNC Precision Lathe No. 6-1 K2,6-1 (Z621);
CNC Precision Lathe No. 4-3 K1,4-3 (Z622);
CNC Precision Lathe No. 6-3 K2,6-3 (Z623);
CNC Precision Lathe No. 7-1 K4,7-1 (Z624);
CNC Precision Lathe No. 7-2 K4,7-1 (Z625);
CNC Precision Lathe No. 7-3 K4,7-3 (Z626);
CNC Precision Lathe No. 7-4 K4,7-4 (Z627);
CNC Precision Lathe No. 8-1 K4,8-1 (Z628);
CNC Precision Lathe No. 8-2 K4,8-2 (Z629);
CNC Precision Lathe No. 8-3 K4,8-3 (Z630);
CNC Precision Lathe No. 8-4 K4,8-4 (Z631);
NC Lathe No. 9 K51 (Z632);
NC Lathe No. 10 K52 (Z633);
NC Lathe No. 11 K53 (Z634);

B. State Only Enforceable Section (continued)

ARL Auto Spray No.1 K36 (Z650);
ARL Auto Spray No.2 K37 (Z651);
Taping Machine H61 (Z660);
Cut/Stamp Machine H177 (Z661);
Cut/Stamp Machine H176 (Z662);
Hose Cutter and Stamper H174 (Z663);
Heat Treat Machine No. 4 A69 (Z664);
Autoclave No. 4 H170 (Z667);
Hose Washing Machine No. 2 H181 (Z668);
Markem Printing Machine US027 (Z669);
Stamping Machine H168 (Z670);
Stamping Machine H167 (Z671);
Stamping and Trimming Machine H173 (Z672);
Stamping Machine H175 (Z673);
Plastic Tube Heat Treatment Machine A72 (Z674);
Dryer W3-2 (Z675);
Filler Hose Washing Machine H161 (Z676);
Preheating Machine A32 (Z677);
Plastic Tube Heat Treatment Machine A33 (Z678);
Auto Labeler H147 (Z679);
Plasma Treatment System H146 (Z680);
Plastic Extruder Control Panel (Z681);
Marking Machine H132 (Z682);
Plastic Mandrel Extruder H54 (Z683);
Silicone Application Unit H214 (Z684);
Hose Cutting and Buffing Machine A63 (Z685);
Hose Cutting and Buffing Machine A92 (Z686);
EFD Glue Gun (Z700);
EFD Glue Gun (Z701);
Loctite Glue Gun (Z702);
EFD Glue Gun (Z704);
EFD Glue Gun (Z705);
3M Scotch Grip Glue Gun (Z706);
Stamping/Marking Cart #1 (Z707);
Stamping/Marking Cart #2 (Z708);
Stamping/Marking Cart #3 (Z709);
Stamping/Marking Cart #4 (Z710);
Stamping/Marking Cart #5 (Z711);
Stamping/Marking Cart #6 (Z712);
Stamping/Marking Cart #7 (Z713);
Stamping/Marking Cart #8 (Z714);
Stamping/Marking Cart #9 (Z715);
Stamping/Marking Cart #10 (Z716);
Stamping/Marking Cart #11 (Z717);
Stamping/Marking Cart #12 (Z718);
Stamping/Marking Cart #13 (Z719);
Stamping/Marking Cart #14 (Z720);
Batch Off Machine #2 S048 (Z725);
90 mm Rubber Extruder H162 (Z726);
Anti-Stick Application Machine H164 (Z727);
Rubber Extruder B290 (Z728);
Anti-Stick Application Machine B216 (Z729);
Batch Off Machine SD004 (Z730);
STI B546 (Z731);
STI B583 (Z732);
STI B682 (Z733); and
STI B683 (Z734)

Facility Name: **DTR Industries Incorporated**

Facility ID: **03-02-00-0166**

SII B683 (2734).

B. State Only Enforceable Section (continued)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 1 (B30-1) (K004)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 1 (B30-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 1 (B30-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 1 (B40-1) (K006)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 1 (B40-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 1 (B40-1)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 2 (B95-1) (K009)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 2 (B95-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 2 (B95-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Coating Machine (Roller Coat) (B94) (K011)
Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive roller coater (B94)	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.1.2.b) 1.47 lbs organic compounds (OC)/hour, 6.44 tons OC/year (excluding cleanup materials) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.1.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.1.2.b.

2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2. Additional Terms and Conditions (continued)

- 2.d The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
1.47 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitation:
6.44 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.1 of this permit.

- 1.d** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.1 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Adhesive Spray Machine No. 3 (B75-1) (K013)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 3 (B75-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		6.79 lbs organic compounds (OC)/hour, 29.74 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
6.79 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
29.74 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

1.d Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

1.e Emission Limitation:

255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

1.f Emission Limitation:

7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 3 (B75-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 205
 Maximum Hourly Emission Rate (lbs/hr): 4.72*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 876.6
 MAGLC (ug/m3): 4,877

Pollutant: toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 7.98*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,418
 MAGLC (ug/m3): 4,476

** represents the combined maximum emission rate for K013 and K016, combined

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Adhesive Spray Machine No. 4 (B165-1) (K016)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 4 (B165-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		6.79 lbs organic compounds (OC)/hour, 29.74 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
6.79 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
29.74 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

1.d Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

1.e Emission Limitation:

255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

1.f Emission Limitation:

7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 4 (B165-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 205
 Maximum Hourly Emission Rate (lbs/hr): 4.72*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 876.6
 MAGLC (ug/m3): 4,877

Pollutant: toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 7.98*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,418
 MAGLC (ug/m3): 4,476

** represents the combined maximum emission rate for K013 and K016, combined

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 3 (B123-1) (K017)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 3 (B123-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.1.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.11 lb particulate emissions (PE)/hour, 0.48 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.1.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.1.2.b.
	OAC rule 3745-17-07(A)	See A.1.2.c.
	OAC rule 3745-17-11(B)	See A.1.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.11 lb of PE/hr, 0.48 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 3 (B123-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 4 (B124-1) (K018)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 4 (B124-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-31-05(D) (PTI #03-13938)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-21-09(U)(2)(f)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 4 (B124-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 3 (B139-1) (K019)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 3 (B139-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 3 (B139-1), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 4 (B247-1) (K023)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 4 (B247-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 4 (B247-1), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 5 (B314-1) (K026)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 5 (B314-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 5 (B314-1), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hose Adhesive Coating Machine (H88) (K029)

Activity Description: Braided yarn covered rubber hose is coated with rubber adhesive via dripping onto surface, then dried

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
hose adhesive coating machine (H88)	OAC rule 3745-31-05(A) (PTI #03-9772)	1.60 lbs of organic compounds (OC)/hr (including cleanup materials)
		3.61 tons of OC/rolling, 12-month summation of the monthly OC emission rates (including cleanup materials)
	OAC rule 3745-21-07(G)(2)	The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		40 lbs OC/day (see A.I.2.c.)

2. Additional Terms and Conditions

- For purposes of federal enforceability, all OCs are considered to be VOCs.
- The 1.60 lbs of OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- The daily OC limitation of 40 lbs/day is greater than the emissions unit's potential to emit of 38.4 lbs/day (the daily potential to emit was determined by multiplying the hourly limitation by 24). Therefore, it is not necessary to develop record keeping, monitoring, and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

- The maximum combined annual coatings and cleanup materials usage rate, for this emissions unit, shall not exceed 993 gallons, based upon a rolling, 12-month summation of the monthly coatings and cleanup materials usage rates.
- The OC content of the cleanup materials shall not exceed 7.27 lbs/gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total OC emissions for each coating and cleanup material employed (b x c), in pounds;
 - e. the total OC emissions for all the coatings and cleanup materials employed, in tons (summation of d for all coatings and cleanup materials, divided by 2000);
 - f. the rolling, 12-month summation of the monthly OC emission rates, in tons;
 - g. the total number of gallons of all the coatings employed;
 - h. the total number of gallons of all the cleanup materials employed;
 - i. the total number of gallons of all the coatings and cleanup materials employed (g + h); and
 - j. the rolling, 12-month summation of the monthly usage rates of all the coatings and cleanup materials, in gallons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 3.61 tons.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the OC content limitation of 7.27 pounds/gallon (for cleanup materials).
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating and cleanup materials usage restriction of 993 gallons.
4. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that summarize the actual annual OC emissions and the combined, coatings and cleanup materials usage rate (in gallons) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
1.60 lbs of OC/hr, including cleanup materials

Applicable Compliance Method:
The permittee may demonstrate compliance as follows:

- i. multiply the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon);
- ii. multiply the maximum cleanup materials usage rate (gallons/hr) by the maximum OC content of all the cleanup materials (lbs/gallon); and
- iii. add i. and ii.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

1.b Emission Limitation:
3.61 tons of OC/rolling, 12-month summation of the monthly OC emission rates

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

1.c Emission Limitation:
993 gallons of coatings and cleanup materials usage, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

1.d Emission Limitation:
7.27 lbs/gallon (for the cleanup materials)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
hose adhesive coating machine (H88)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13938 issued on November 20, 1996: A.III.2 thru4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 2 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 1.60
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 15.2
 MAGLC (ug/m3): 4,476

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 7 (B360-1) (K030)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 7 (B360-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 7 (B360-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 8 (B361-1) (K031)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 8 (B361-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 8 (B361-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Adhesive Spray Machine No. 9 (B362-1) (K032)
Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 9 (B362-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (excluding cleanup materials)
		0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
7.07 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
30.97 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automatic adhesive spray machine no. 9 (B362-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Adhesive Spray Machine No. 5 (B365-1) (K033)
Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 5 (B365-1), with water wash or dry filtration system	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b)
		11.69 lbs organic compounds (OC)/hour, 51.2 tons OC/year (excluding cleanup materials)
		0.11 lb particulate emissions (PE)/hour, 0.48 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13938)	255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.a, combined, including cleanup materials
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from the Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.
- 2.e The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 7.0 lbs/gallon of coating, excluding water and exempt solvent; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 255 tons (for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
11.69 lbs OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b Emission Limitation:
51.2 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c Emission Limitations:
0.11 lb of PE/hr, 0.48 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:
255 tons OC per rolling, 365-day period (for all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2. of this permit.

- 1.f** Emission Limitation:
7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine no. 5 (B365-1), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

III. Monitoring and/or Record Keeping Requirements (continued)

1.a Pollutant: ethyl benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,353
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 23.87**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,220
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene
TLV (mg/m3): 170
Maximum Hourly Emission Rate (lbs/hr): 2.99***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2,225
MAGLC (ug/m3): 4,048

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 16.46****
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,418
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 9,758
MAGLC (ug/m3): 10,333

* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

** represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

*** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

**** represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 6 (Auto) (B491-1) (K035)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 6 (B491-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 6 (B491-1), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 7 (Auto) (B510-1) (K036)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 7 (B510-1), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 7 (B510-1), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Adhesive Dipping & Crimping Machine (A12) (K039)
Activity Description: Manual Surface Coating Operation For Miscellaneous Metal Parts For EFI Hose Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive dipping machine (A12)	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	6.42 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see A.1.2.a)
		0.16 lb OC/hour, 0.70 ton OC/year (from coating operations)
		110 lbs OC/month, 0.66 ton OC/year (from cleanup operations)
	OAC rule 3745-21-09(U)(2)(f)	See A.1.2.a.

2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13938, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 2.b The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and maintain the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
2. The permittee shall collect and maintain monthly records of the following information for the cleanup operations:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds; and
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials, divided by 2000].

IV. Reporting Requirements

1. The permittee shall submit annual written reports that summarize the actual annual OC emissions (for cleanup materials and coatings) for this emissions unit. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 6.42 lbs VOC/gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the monthly OC emission limitation of 110 lbs (from cleanup materials).

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
0.16 lb OC/hour

Applicable Compliance Method:
The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
 - 1.b Emission Limitation:
0.70 ton OC/year

Applicable Compliance Method:
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
110 lbs OC/month and 0.66 TPY OC, from cleanup materials

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on record keeping requirements in section A.III.2 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12, and then dividing by 2000).

- 1.d** Emission Limitation:
6.42 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.1 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive dipping machine (A12)	see below	see below

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions unit K033, and K039 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
TLV (mg/m3): 204.82
Maximum Hourly Emission Rate (lbs/hr): 4.91*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1440
MAGLC (ug/m3): 4877

Pollutant: toluene
TLV (mg/m3): 188.40
Maximum Hourly Emission Rate (lbs/hr): 6.6**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1937
MAGLC (ug/m3): 4486

Pollutant: methyl ethyl ketone
TLV (mg/m3): 589.78
Maximum Hourly Emission Rate (lbs/hr): 0.09***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 20.60
MAGLC (ug/m3): 14042

*Combined emission rates for K033, and K039.

**Emission rate for K033.

***Emission rate for K039.

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Dipping Machine No. 2 (A64) (K040)
Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Electronic Fuel Injection Hose Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine no. 2 (A64)	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.40 lb organic compounds (OC)/hour, 1.75 tons OC/year, from coatings
	OAC rule 3745-21-09(U)(2)(e)(iii)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii). 10 gallons of coatings/day

2. Additional Terms and Conditions

- The 10 gallon/day coating usage restriction is greater than the emissions unit's maximum coating usage rate [the maximum coating usage rate for this emissions unit is 1.416 gallons per day (0.059 gallon/hr multiplied by 24)]. Therefore, no monitoring, record keeping, and /or reporting requirements are necessary to ensure compliance with the daily coating usage restriction of 10 gallons.
- The hourly and annual OC emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.40 lb OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitation:
1.75 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine no. 2 (A64)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 204.82
 Maximum Hourly Emission Rate (lbs/hr): 0.00002
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.01057
 MAGLC (ug/m3): 4877

Pollutant: methyl ethyl ketone
 TLV (mg/m3): 589.78
 Maximum Hourly Emission Rate (lbs/hr): 0.30
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 141.00
 MAGLC (ug/m3): 14042

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine No. 8 (B602-1,2) (K041)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 8 (B602-1,2), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 8 (B602-1,2), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hose Adhesive Application Machine (H192) (K042)

Activity Description: Braided yarn covered rubber hose is coated with rubber adhesive via dripping onto surface, then dried

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
hose adhesive coating machine no. 2 (H192)	OAC rule 3745-31-05(A) (PTI #03-9772)	0.20 lb of organic compounds (OC)/hr, 0.88 ton of OC/year (from coatings)
	OAC rule 3745-21-07(G)(2)	The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). 40 lbs OC/day (see A.I.2.c.)

2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The 0.20 lb of OC/hr and 0.88 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c The daily OC limitation of 40 lbs/day is greater than the emissions unit's potential to emit of 4.8 lbs/day (the daily potential to emit was determined by multiplying the hourly limitation by 24). Therefore, it is not necessary to develop record keeping, monitoring, and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitation:
0.20 lb of OC/hr, from coatings

Applicable Compliance Method:

The permittee may demonstrate compliance by multiplying the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

1.b Emission Limitation:
0.88 ton of OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
hose adhesive coating machine no. 2 (H192)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 2 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: toluene
 TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 73.3
 MAGLC (ug/m3): 4,486

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Adhesive Spray Machine (B540) (K043)

Activity Description:

Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine (B540), equipped with water wash or dry filtration system	OAC rule 3745-31-05(A) (PTI #03-13938)	0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year Visible PE shall not exceed 0% opacity, as a six-minute average. 63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year (from primer coating operations) 67.30 lbs OC/day, 12.28 tons OC/year (from topcoat coating operations) 0.07 ton OC/month, 0.87 ton OC/year (from cleanup materials)
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.a. 255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.b, combined
	OAC rule 3745-21-09(U)(2)(e)(iii)	10 gallons of coating in any one day from primer coating operations, and 10 gallons of coating in any one day from topcoat operations
	OAC rule 3745-17-11(B)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-31-05(D).

2. Additional Terms and Conditions (continued)

- 2.b** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations (emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The daily OC emission limitations of 63.7 lbs and 67.3 lbs were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

- 1.** The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
- 2.** The permittee shall not employ any primer coating, as applied, in excess of 6.37 lbs OC/gallon.
- 3.** The permittee shall not employ any topcoat coating, as applied, in excess of 6.73 lbs OC/gallon.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2.** The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all the topcoats employed; and
 - f. the OC content of each coating (primer and topcoat), in pounds/gallon, as applied.
- 3.** The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds;
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials].

III. Monitoring and/or Record Keeping Requirements (continued)

4. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - e. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - f. the rolling, 365-day summation of the total OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the coating usage restrictions from primer coating operations and topcoat operations of 10 gallons each;
 - b. all exceedances of the OC contents for primer coating and topcoats of 6.37 lbs OC/gallon and 6.73 lbs OC/gallon, respectively;
 - c. all exceedances of the monthly OC emission limitation of 0.07 ton (from cleanup materials); and
 - d. all exceedances of the rolling, 365-day OC emission limitation of 255 tons for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined.

V. Testing Requirements

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

- 1.a Emission Limitation:
63.70 lbs OC/day, from primer coating operations

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum OC content of all the primer coatings (lbs/gallon) by the maximum coating usage rate (gallons per day).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
11.63 tons OC/year, from primer coating operations

Applicable Compliance Method:

As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).

- 1.c** Emission Limitation:
67.30 lbs OC/day, from topcoat operations

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum OC content of all the topcoat coatings (lbs/gallon) by the maximum topcoat coating usage rate (gallons per day).

- 1.d** Emission Limitation:
12.28 tons OC/year, from topcoat operations

Applicable Compliance Method

As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).

- 1.e** Emission Limitations:
0.07 ton OC/month and 0.87 ton OC/year, from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on record keeping requirements in section A.III.3 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12 and dividing by 2000).

- 1.f** Emission Limitations:
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

V. Testing Requirements (continued)

1.g Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

1.h Emission Limitation:

255 tons OC per rolling, 365-day period (from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined)

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based on the record keeping requirements in section A.III.4 of this permit.

1.i Emission Limitation:

10 gallons/day, from primer coating operations, and 10 gallons/day, from topcoat coating operations

Applicable Compliance Method:

Compliance with the coating usage restrictions above shall be determined based on record keeping requirements in section A.III.2 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual adhesive spray machine (B540)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions unit K042 and K043 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 204.82
 Maximum Hourly Emission Rate (lbs/hr): 5.35
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1637
 MAGLC (ug/m3): 4877

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 7.47*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2297
 MAGLC (ug/m3): 4486

*Combined emission rate for K042 and K043.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Paint Spray Machine (B210) (K044)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual paint spray machine (B210), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.35 lb organic compounds (OC)/hr, 1.53 tons OC/yr
		0.08 lb particulate emissions (PE)/hr, 0.35 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined, for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.35 lb OC/hr and 1.53 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.08 lb PE/hr and 0.35 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1 - 5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
manual paint spray machine (B210)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 4.40
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075 **
 MAGLC (ug/m3): 2338

* Based on ISCST3 model
 ** Based on Screen 3 model

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Auto Spray (B640) (K045)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
eponics paint auto spray (B640), with water wash or dry filtration system	OAC rule 3745-31-05(A) (PTI #03-13938)	0.09 lb particulate emissions (PE)/hour, 0.39 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		57.60 lbs organic compounds (OC)/day (from coating operations)
		0.02 ton OC/month, 0.24 ton OC/year (from cleanup materials)
		See A.I.2.a.
	OAC rule 3745-31-05(D) (PTI #03-13938)	10.51 tons OC per rolling, 12-month period, from all the emissions units identified in A.I.2.b, combined
	OAC rule 3745-21-09(U)(2)(e)(iii)	10 gallons of coating in any one day from coating operations
	OAC rule 3745-17-11(B)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b** The permittee has requested a federally enforceable limitation of 10.51 tons OC per rolling, 12-month period (for emissions units K045 and K050, combined) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** The daily OC emission limitation of 57.60 lbs was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. The permittee shall not employ any coating, as applied, in excess of 5.76 lbs OC/gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all the coatings employed.
3. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds; and
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials, divided by 2000].
4. In order to demonstrate compliance with the 10.51 tons OC per rolling, 12-month period, the permittee shall collect and record the following information each month for emission units K045 and K050, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (b x c), in pounds;
 - e. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of d for all coatings and cleanup materials, divided by 2000); and
 - f. the rolling, 12-month summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the coating usage restriction of 10 gallons;
 - b. all exceedances of the OC content of 5.76 lbs OC/gallon;
 - c. all exceedances of the monthly OC emission limitation of 0.02 ton (from cleanup material); and
 - d. all exceedances of the rolling, 12-month OC emission limitation of 10.51 tons (for emissions units K045, and K050, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
57.60 lbs OC/day, from coating operations

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum OC content of all the coatings (lbs/gallon) by the maximum coating usage rate (gallons per day).

- 1.b Emission Limitations:
0.02 ton OC/month, 0.24 ton OC/year, from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on the record keeping requirements in section A.III.3 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12).

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
0.09 lb of PE/hr, 0.39 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be based on stack testing conducted in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.e** Emission Limitation:
10.51 tons OC per rolling, 12-month period (for emissions units K045 and K050, combined).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based on the record keeping requirements in section A.III.4 of this permit.

- 1.f** Emission Limitation:
10 gallons/day, from coating operations

Applicable Compliance Method:

Compliance with the coating usage restriction above shall be determined based on record keeping requirements in section A.III.2. of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
eponics paint auto spray (B640), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 2.43
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 613.3
 MAGLC (ug/m3): 4486

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Dipping Machine (B650,1) (K046)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine (B650)	OAC rule 3745-31-05(A) (PTI #03-13938)	63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year (from primer coating operations)
		67.30 lbs OC/day, 12.28 tons OC/year (from topcoat coating operations)
		0.73 ton OC/month, 8.76 tons OC/year (from cleanup materials)
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.a.
		255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.b, combined
		10 gallons of coating in any one day from primer coating operations, and 10 gallons of coating in any one day from topcoat operations
OAC rule 3745-21-09(U)(2)(e)(iii)		

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-31-05(D).
- 2.b The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations (emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.c The daily OC emission limitations of 63.7 lbs and 67.3 lbs were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any primer coating, as applied, in excess of 6.37 lbs OC/gallon.
2. The permittee shall not employ any topcoat coating, as applied, in excess of 6.73 lbs OC/gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all the topcoats employed;
 - f. the OC content of each coating (primer and topcoat), in pounds/gallon, as applied;
 - g. the OC emission rate for each coating (primer and topcoat), in pounds [(b x f) for each primer and (d x f) for each topcoat];
 - h. the total OC emission rate for all the coatings (primers and topcoats), in pounds (summation of g for all primers and summation of g for all topcoats).
2. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds;
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials, divided by 2000].
3. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - e. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - f. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the coating usage restrictions from primer coating operations and topcoat operations of 10 gallons each;
 - b. all exceedances of the OC contents for primer coating and topcoats of 6.37 lbs OC/gallon and 6.73 lbs OC/gallon, respectively;
 - c. all exceedances of the monthly OC emission limitation of 0.73 ton (from cleanup materials); and
 - d. all exceedances of the rolling, 365-day OC emission limitation of 255 tons for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
63.70 lbs OC/day, from primer coating operations

Applicable Compliance Method:
The emission limitation was established by multiplying the maximum OC content of all the primer coatings (lbs/gallon) by the maximum coating usage rate (gallons per day).
 - 1.b Emission Limitation:
11.63 tons OC/year, from primer coating operations

Applicable Compliance Method:
As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).
 - 1.c Emission Limitation:
67.30 lbs OC/day, from topcoat operations

Applicable Compliance Method:
The emission limitation was established by multiplying the maximum OC content of all the topcoat coatings (lbs/gallon) by the maximum topcoat coating usage rate (gallons per day).
 - 1.d Emission Limitation:
12.28 tons OC/year, from topcoat operations

Applicable Compliance Method
As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).

V. Testing Requirements (continued)

- 1.e** Emission Limitations:
0.73 ton OC/month and 8.76 tons OC/year, from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on record keeping requirements in section A.III.2 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12 and dividing by 2000).

- 1.f** Emission Limitation:
255 tons OC per rolling, 365-day period (from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined)

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based on the record keeping requirements in section A.III.4 of this permit.

- 1.g** Emission Limitation:
10 gallons/day, from primer coating operations, and 10 gallons/day, from topcoat coating operations

Applicable Compliance Method:

Compliance with the coating usage restrictions above shall be determined based on record keeping requirements in section A.III.2 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine (B650)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 204.82
 Maximum Hourly Emission Rate (lbs/hr): 10.19*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2832
 MAGLC (ug/m3): 4877

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 11.49*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3208
 MAGLC (ug/m3): 4486

* combined emission rate for K046 and K048

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Dipping Machine (B657,1) (K048)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine (B657)	OAC rule 3745-31-05(A) (PTI #03-13938)	63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year (from primer coating operations)
		67.30 lbs OC/day, 12.28 tons OC/year (from topcoat coating operations)
		0.73 ton OC/month, 8.76 tons OC/year (from cleanup materials)
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.a.
		255 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.b, combined
		10 gallons of coating in any one day from primer coating operations, and 10 gallons of coating in any one day from topcoat operations
OAC rule 3745-21-09(U)(2)(e)(iii)		

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-31-05(D).
- 2.b The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations (emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.c The daily OC emission limitations of 63.7 lbs and 67.3 lbs were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any primer coating, as applied, in excess of 6.37 lbs OC/gallon.
2. The permittee shall not employ any topcoat coating, as applied, in excess of 6.73 lbs OC/gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all the topcoats employed;
 - f. the OC content of each coating (primer and topcoat), in pounds/gallon, as applied;
 - g. the OC emission rate for each coating (primer and topcoat), in pounds [(b x f) for each primer and (d x f) for each topcoat];
 - h. the total OC emission rate for all the coatings (primers and topcoats), in pounds (summation of g for all primers and summation of g for all topcoats).
2. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds;
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials, divided by 2000].
3. In order to demonstrate compliance with the 255 tons OC per rolling, 365-day period, the permittee shall collect and record the following each day for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - e. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - f. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the coating usage restrictions from primer coating operations and topcoat operations of 10 gallons each;
 - b. all exceedances of the OC contents for primer coating and topcoats of 6.37 lbs OC/gallon and 6.73 lbs OC/gallon, respectively;
 - c. all exceedances of the monthly OC emission limitation of 0.73 ton (from cleanup materials); and
 - d. all exceedances of the rolling, 365-day OC emission limitation of 255 tons for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048, combined.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
63.70 lbs OC/day, from primer coating operations

Applicable Compliance Method:
The emission limitation was established by multiplying the maximum OC content of all the primer coatings (lbs/gallon) by the maximum coating usage rate (gallons per day).
 - 1.b Emission Limitation:
11.63 tons OC/year, from primer coating operations

Applicable Compliance Method:
As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).
 - 1.c Emission Limitation:
67.30 lbs OC/day, from topcoat operations

Applicable Compliance Method:
The emission limitation was established by multiplying the maximum OC content of all the topcoat coatings (lbs/gallon) by the maximum topcoat coating usage rate (gallons per day).
 - 1.d Emission Limitation:
12.28 tons OC/year, from topcoat operations

Applicable Compliance Method
As long as compliance with the daily limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the daily limitation by 365 and then dividing by 2000).

V. Testing Requirements (continued)

- 1.e** Emission Limitations:
0.73 ton OC/month and 8.76 tons OC/year, from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on record keeping requirements in section A.III.2 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12 and dividing by 2000).

- 1.f** Emission Limitation:
255 tons OC per rolling, 365-day period (from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined)

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based on the record keeping requirements in section A.III.4 of this permit.

- 1.g** Emission Limitation:
10 gallons/day, from primer coating operations, and 10 gallons/day, from topcoat coating operations

Applicable Compliance Method:

Compliance with the coating usage restrictions above shall be determined based on record keeping requirements in section A.III.2 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
adhesive dipping machine (B657)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: methyl isobutyl ketone
 TLV (mg/m3): 204.82
 Maximum Hourly Emission Rate (lbs/hr): 10.19*
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 2832
 MAGLC (ug/m3): 4877

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 11.49*
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 3208
 MAGLC (ug/m3): 4486

* combined emission rate for K046 and K048

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Eponics Paint Auto Spray (B792) (K050)

Activity Description: Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
eponics paint auto spray (B792), with water wash or dry filtration system	OAC rule 3745-31-05(A) (PTI #03-13938)	0.09 lb particulate emissions (PE)/hour, 0.39 ton PE/year
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		57.60 lbs organic compounds (OC)/day (from coating operations)
		0.02 ton OC/month, 0.24 ton OC/year (from cleanup materials)
		See A.I.2.a.
	OAC rule 3745-31-05(D) (PTI #03-13938)	10.51 tons OC per rolling, 12-month period, from all the emissions units identified in A.I.2.b, combined
	OAC rule 3745-21-09(U)(2)(e)(iii)	10 gallons of coating in any one day from coating operations
	OAC rule 3745-17-11(B)	See A.I.2.c.
	OAC rule 3745-17-07(A)	See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b** The permittee has requested a federally enforceable limitation of 10.51 tons OC per rolling, 12-month period (for emissions units K045 and K050, combined) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** The daily OC emission limitation of 57.60 lbs was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. The permittee shall not employ any coating, as applied, in excess of 5.76 lbs OC/gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number for each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all the coatings employed.
3. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emission rate for each cleanup material employed (b x c), in pounds; and
 - e. the total monthly OC emission rate for all the cleanup materials employed, in tons [summation of d for all cleanup materials, divided by 2000].
4. In order to demonstrate compliance with the 10.51 tons OC per rolling, 12-month period, the permittee shall collect and record the following information each month for emissions units K045 and K050, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed (b x c), in pounds;
 - e. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of d for all coatings and cleanup materials, divided by 2000); and
 - f. the rolling, 12-month summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the coating usage restriction of 10 gallons;
 - b. all exceedances of the OC content of 5.76 lbs OC/gallon;
 - c. all exceedances of the monthly OC emission limitation of 0.02 ton (from cleanup material); and
 - d. all exceedances of the rolling, 12-month OC emission limitation of 10.51 tons (for emissions units K045, and K050, combined).

V. Testing Requirements

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

- 1.a Emission Limitation:
57.60 lbs OC/day, from coating operations

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum OC content of all the coatings (lbs/gallon) by the maximum coating usage rate (gallons per day).

- 1.b Emission Limitations:
0.02 ton OC/month, 0.24 ton OC/year, from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be determined based on the record keeping requirements in section A.III.3 of this permit.

As long as compliance with the monthly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the monthly limitation by 12).

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
0.09 lb of PE/hr, 0.39 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be based on stack testing conducted in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- 1.e** Emission Limitation:
10.51 tons OC per rolling, 12-month period (for emissions units K045 and K050, combined).

Applicable Compliance Method:

Compliance with the annual OC emission limitation shall be determined based on the record keeping requirements in section A.III.4 of this permit.

- 1.f** Emission Limitation:
10 gallons/day, from coating operations

Applicable Compliance Method:

Compliance with the coating usage restriction above shall be determined based on record keeping requirements in section A.III.2. of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
eponics paint auto spray (B792), with water wash or dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 2.43
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 613.3
 MAGLC (ug/m3): 4486

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine #9 (B864) (K051)

Activity Description: Surface Coating Operation for Miscellaneous Metal Parts for Anti-Vibration Products Using a VOC Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 9 (B864), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.83 lb organic compounds (OC)/hr, 3.64 tons OC/yr
		0.17 lb particulate emissions (PE)/hr, 0.74 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.83 lb OC/hr and 3.64 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.17 lb PE/hr and 0.74 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 9 (B864), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 1.90
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.5 *
 MAGLC (ug/m3): 2338

* combined emission rate for emissions units K051, K052, and K053

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine #10 (B873) (K052)

Activity Description: Surface Coating Operation for Miscellaneous Metal Parts for Anti-Vibration Products Using a VOC Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 10 (B873), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.83 lb organic compounds (OC)/hr, 3.64 tons OC/yr
		0.17 lb particulate emissions (PE)/hr, 0.74 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.83 lb OC/hr and 3.64 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.17 lb PE/hr and 0.74 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 10 (B873), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 1.90
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.5 *
 MAGLC (ug/m3): 2338

* combined emission rate for emissions units K051, K052, and K053

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Spray Machine #11 (B881) (K053)

Activity Description: Surface Coating Operation for Miscellaneous Metal Parts for Anit-Vibration Products Using a VOC Compliant Coating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 11 (B881), with water wash or dry filtration	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr
		0.13 lb particulate emissions (PE)/hr, 0.57 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for extreme performance coating
	OAC rule 3745-31-05(D) (PTI #03-13938)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in A.I.2.c, combined, including cleanup materials

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons OC per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following information each day for emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rate for each coating and cleanup material employed (b x d), in pounds;
 - f. the total OC emission rate for all the coatings and cleanup materials employed, in tons (summation of e for all coatings and cleanup materials, divided by 2000); and
 - g. the rolling, 365-day summation of the daily OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the VOC content restriction of 3.5 lbs per gallon of coating, excluding water and exempt solvents; and
 - b. all exceedances of the rolling, 365-day OC emission limitation of 18 tons (for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053, combined).

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable OC limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitations:
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

- 1.c** Emission Limitation:
18 tons OC per rolling, 365-day period (for all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined)

Applicable Compliance Method:

Compliance with the OC limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined based on the record keeping requirements in section A.III.2 of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paint spray machine no. 11 (B881), with water wash or dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 98.2
 Maximum Hourly Emission Rate (lbs/hr): 1.90
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.5 *
 MAGLC (ug/m3): 2338

* combined emission rate for emissions units K051, K052, and K053

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FKM/Adhesive Dipping Machine (A149) (K054)
Activity Description: Surface Coating Operation for Miscellaneous Metal Parts for Hose Products Using VOC Non-Compliant Coatings.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
FKM/adhesive dipping machine (A149)	OAC rule 3745-31-05(A)(3) (PTI #03-13938)	0.51 lb organic compounds (OC)/hour, 2.23 tons OC/year, from coatings
	OAC rule 3745-21-09(U)(2)(e)(iii)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii). 10 gallons of coatings/day

2. Additional Terms and Conditions

- 2.a The 10 gallon/day coating usage restriction is greater than the emissions unit's maximum coating usage rate [the maximum coating usage rate for this emissions unit is 1.92 gallons per day (0.08 gallon/hr multiplied by 24)]. Therefore, no monitoring, record keeping, and /or reporting requirements are necessary to ensure compliance with the daily coating usage restriction of 10 gallons.
- 2.b The hourly and annual OC emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.51 lb OC/hour

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitation:
2.23 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BB240 Banbury Mixer #1 (S17-1) (P037)

Activity Description: Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
BB240 Banbury mixer (S17-1), with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-13850)	0.36 lb/hr of PE, 1.58 tons of PE/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

2. Additional Terms and Conditions

- 2.a The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b The 0.36 lb of PE/hr, and 1.58 tons of PE/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c This emissions unit is not subject to OAC rule 3745-21-07(G)(2) based upon the decision by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1. of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with the methods in OAC rule 3745-17-03(B)(1).

1.b Emission limitations:

0.36 lb of PE/hr, 1.58 tons of PE/yr

Applicable compliance method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (2,682 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)*

C = operating control efficiency of the baghouse (99.0 percent)

* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hose Marking Machine #1 (H70) (P043)
Activity Description: Ink Printing Operation For EFI Rubber Hose Using Transfer Head Process.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
hose marking machine (H70)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.30 lb of organic compounds (OC)/hr, 1.31 tons of OC/yr (from the use of coatings) 69.8 lbs of OC/month, 0.35 ton of OC/rolling, 12-month period (from the use of cleanup materials)
	OAC rule 3745-21-07(G)(2)	See A.I.2.b. and A.II.1. The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). 40 lbs OC/day (see A.I.2.c.)

2. Additional Terms and Conditions

- 2.a The 0.30 lb/hr and 1.31 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The daily OC limitation of 40 lbs/day is greater than the emissions unit's potential to emit of 7.2 lbs/day (the daily potential to emit was determined by multiplying the hourly limitation by 24). Therefore, it is not necessary to develop record keeping, monitoring, and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined by OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each cleanup material, as applied;
 - b. documentation on whether or not each cleanup material is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the total OC input rate for each cleanup material employed (c x d), in pounds;
 - f. the total OC rate for all the cleanup materials employed (summation of e for all cleanup materials, divided by 2000), in pounds; and
 - g. the rolling, 12-month summation of the monthly OC input rates, in tons.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the of the monthly OC input rate of 69.8 pounds (for cleanup materials); and
 - b. all exceedances of the rolling, 12-month OC input rate limitation of 0.35 ton (for cleanup materials).
2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit (from cleanup materials usage) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying cleanup material (i.e., photochemically reactive cleanup material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitations:
0.30 lb of OC/hr, 1.31 tons of OC/yr (for coatings usage)

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

As long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
69.8 lbs of OC/month; 0.35 ton of OC/rolling, 12-month period (for cleanup materials usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.1 w/(2) Steam Cleaning Systems(B309) (P046)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 1, with 2 steam clean systems (B309)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

1.b Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

1.c Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

1.d Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.2 w/(2) Steam Cleaning Systems(B329) (P047)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 2, with 2 steam clean systems (B329)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.3 w/(1) Steam Cleaning System (B462) (P049)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 3, with 1 steam clean system (B462)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

1.b Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

1.c Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

1.d Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.4 w/(1) Steam Cleaning System (B464) (P050)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 4, with 1 steam clean system (B464)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.5 w/(1) Steam Cleaning System (B486) (P051)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 5, with 1 steam clean system (B486)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.6 w/(1) Steam Cleaning System (B505) (P052)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 6, with 1 steam clean system (B505)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank No.7 w/(1) Steam Cleaning System (B507) (P053)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 7, with 1 steam clean system (B507)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.8 lb and 3.5 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.80 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.50 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Submerged Assembling Machine (B552) (P059)
Activity Description: Glycol dip tank with (1) steam cleaning system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 8, with cleaning operation (B552)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.42 lb of organic compounds (OC)/hr, 1.84 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.42 lb and 1.84 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.42 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 58 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.84 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Submerged Assembling Machine (B596) (P060)
Activity Description: Glycol dip tank with (1) steam cleaning system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank no. 9, with cleaning operation (B596)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.42 lb of organic compounds (OC)/hr, 1.84 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.42 lb and 1.84 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.42 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 58 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.84 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Joint Assembly Machine (A60) (P061)
Activity Description: MEK and Methanol blend is used as a cleaning and insertion agent for rubber hose and metal joint

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
joint hose assembly machine no. 3 (A60)	OAC rule 3745-31-05(A) (PTI #03-13411)	0.30 lb of organic compounds (OC)/hr, 1.31 tons of OC/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The 0.30 lb of OC/hr and 1.31 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

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

1.a Emission Limitation:
0.30 lb of OC/hr

Applicable Compliance Method:

The permittee may determine compliance by multiplying the maximum hourly liquid organic materials usage rate (gallons/hr) by the maximum OC content of all of the liquid organic materials (lbs/gallon).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

1.b Emission Limitation:
1.31 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
joint hose assembly machine no. 3 (A60)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13411 issued on July 18, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permit to install for this emissions unit was evaluated based on the actual materials (hose cleaning and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: methanol
 TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 253.8
 MAGLC (ug/m3): 6,238

III. Monitoring and/or Record Keeping Requirements (continued)

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (hose cleaning or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Banbury Mixer #2 (S040) (P064)

Activity Description: Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
banbury mixer no. 2 (S040), with baghouse	OAC rule 3745-31-05(A) (PTI #03-3085)	0.58 lb/hr of particulate emissions (PE), 2.54 tons of PE/yr 0.65 lb/hr of organic compounds (OC), 2.85 tons of OC/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The 0.58 lb of PE/hr, 2.54 tons of PE/yr, 0.65 lb of OC/hr and 2.85 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d This emissions unit is not subject to OAC rule 3745-21-07(G)(2) based upon the decision by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.1 to 3 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.58 lb of PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)*

C = operating control efficiency of the baghouse (99.0 percent)

* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC 3745-17-03(B)(10).

- 1.b Emission Limitation:
2.54 tons of PE/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
0.65 lb of OC/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by using the following formula:

$$\text{OC (lbs/hr)} = [P \times E]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.000153 = emission factor (lb OC/lb of product processed)*

* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 13.

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with 40 CFR 60, Appendix A, Methods 18, 25 or 25A, as applicable.

- 1.d** Emission Limitation:
2.85 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.e** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Roll Mill #2 (S047) (P065)

Activity Description: Rubber Milling Machine: Particulate Air Emission Sources controlled by a Baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
roll mill no. 2 (S047)	OAC rule 3745-31-05(A) (PTI #03-3085)	0.58 lb/hr of particulate emissions (PE), 2.54 tons of PE/yr 0.65 lb/hr of organic compounds (OC), 2.85 tons of OC/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a** The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c** The 0.58 lb of PE/hr, 2.54 tons of PE/yr, 0.65 lb of OC/hr and 2.85 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically" reactive material is defined in OAC rule 3745-21-01(C)(5).
2. The pressure drop across the baghouse shall be maintained within the range of 0.1 to 3 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.58 lb of PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)*

C = operating control efficiency of the baghouse (99.0 percent)

* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC 3745-17-03(B)(10).

- 1.b** Emission Limitation:
2.54 tons of PE/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:
0.65 lb of OC/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by using the following formula:

$$OC \text{ (lbs/hr)} = [P \times E]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.000153 = emission factor (lb OC/lb of product processed)*

* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 13.

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with 40 CFR 60, Appendix A, Methods 18, 25 or 25A, as applicable.

V. Testing Requirements (continued)

1.d Emission Limitation:
2.85 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

1.e Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Submerged Assembling Machine (B676) (P066)
Activity Description: Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B676)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.76 lb of organic compounds (OC)/hr, 3.33 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.76 lb and 3.33 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.76 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 105 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
3.33 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vacuum System (US46) (P067)

Activity Description: Particulate Matter Collection System for Housekeeping Activities in Rubber Mixing Area

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
vacuum system - US46	OAC rule 3745-31-05 (A)(3) (PTI #03-13601)	0.34 lb particulate emissions (PE)/hr 1.49 tons PE/yr 0.02 gr/dscf (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	5% opacity, as a six-minute average See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.b.

2. Additional Terms and Conditions

- Best available technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.
- The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-31-05 (A)(3).

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 1 - 8 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1. of the terms and conditions of this permit. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitations:
0.34 lb PE/hr & 1.49 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (2000 acfm) and by 60, and then dividing by 7000.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

1.b Emission Limitation:
0.02 gr/dscf

Applicable Compliance Method:

If required, compliance with this limitation shall be based on stack testing conducted in accordance with 40 CFR Part 60, Appendix A - Methods 1 - 5.

1.c Emission Limitation:
5% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carbon Dust Handling System (US54) (P068)
Activity Description: Particulate Matter Collection System for Four Existing Dust Collectors

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
carbon dust handling system - US54	OAC rule 3745-31-05 (A)(3) (PTI #03-13601)	0.09 lb particulate emissions (PE)/hr 0.39 ton PE/yr 0.02 gr/dscf (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	5% opacity, as a six-minute average See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 - 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1. of the terms and conditions of this permit. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitations:
0.09 lb PE/hr & 0.39 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE limitation by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (500 acfm) and by 60, and then dividing by 7000.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

1.b Emission Limitation:
0.02 gr/dscf

Applicable Compliance Method:

If required, compliance with this limitation shall be based on stack testing conducted in accordance with 40 CFR Part 60, Appendix A - Methods 1 - 5.

1.c Emission Limitation:
5% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Auto-Handweigh System (S50/S51) (P069)
Activity Description: Particulate Matter Collection System for a Chemical Weigh Station

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
auto-handweigh system - S14	OAC rule 3745-31-05 (A)(3) (PTI #03-13601)	0.86 lb particulate emissions (PE)/hr 3.77 tons PE/yr 0.02 gr/dscf (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	5% opacity, as a six-minute average See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 - 14 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1. of the terms and conditions of this permit. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitations:
0.86 lb PE/hr & 3.77 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance by multiplying the manufacturer's - guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (5000 acfm) and by 60, and then dividing by 7000.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

1.b Emission Limitation:
0.02 gr/dscf

Applicable Compliance Method:

If required, compliance with this limitation shall be based on stack testing conducted in accordance with 40 CFR Part 60, Appendix A - Methods 1 - 5.

1.c Emission Limitation:
5% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank (B815) (P070)

Activity Description: Steam Cleaning Operation for Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B815)	OAC rule 3745-31-05(A) (PTI #03-13938)	0.65 lb of organic compounds (OC)/hr, 2.85 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 0.65 lb and 2.85 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.65 lb of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 90 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
2.85 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B815)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Ethylene Glycol
 TLV (mg/m3): 73.7
 Maximum Hourly Emission Rate (lbs/hr): 2.87 *
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 414.3
 MAGLC (ug/m3): 1755

* combined emission rate for P070, P071, and P072

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank (B860) (P071)

Activity Description: Steam Cleaning Operation for Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B860)	OAC rule 3745-31-05(A) (PTI #03-13938)	1.73 lbs of organic compounds (OC)/hr, 7.58 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 1.73 lb and 7.58 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
1.73 lbs of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 240 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
7.58 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B860)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Ethylene Glycol
 TLV (mg/m3): 73.7
 Maximum Hourly Emission Rate (lbs/hr): 2.87 *
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 414.3
 MAGLC (ug/m3): 1755

* combined emission rate for P070, P071, and P072

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Glycol Dip Tank (B869) (P072)

Activity Description: Steam Cleaning Operation for Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B869)	OAC rule 3745-31-05(A) (PTI #03-13938)	1.73 lbs of organic compounds (OC)/hr, 7.58 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13938)	See A.I.2.c. 33 tons OC per rolling, 12-month period from all the emissions units identified in A.I.2.a, combined
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) for purposes of avoiding PSD applicability.
- 2.b The hourly and annual OC emission limitations of 1.73 lb and 7.58 tons, respectively, were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with these limitations.
- 2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The maximum annual production of liquid-filled engine mounts for Anti-Vibration Glycol Dipping Process operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined) shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the monthly production rates for these emissions units.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the 33 tons OC per rolling, 12 month period, the permittee shall collect and record the following information each month for Anti-Vibration Glycol Dipping Process Operations (emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined):
 - a. the total number of units produced;
 - b. the total OC emissions, in tons (units produced/month, from A.III.2.a) x (0.0072 pound OC/unit produced*)x (ton/2000 lbs);
 - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - d. the rolling, 12-month summation of the monthly numbers of units produced.

* based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production limitation of 9,166,666 units and the rolling, 12-month OC emission limitation of 33 tons (for Anti-Vibrations Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined). The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any photochemically reactive liquid organic material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- 1.a Emission Limitation:
1.73 lbs of OC/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum production rate of 240 units produced/hour by an emission factor of 0.0072 lb OC/unit produced.*

* The emission factor was based on the results of emission testing conducted by the permittee on March 12, 1997 on a similar emissions unit.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
7.58 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760 and then dividing by 2000).

- 1.c** Emission Limitation:
33 tons OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

- 1.d** Operational Restriction:
9,166,666 units OC per rolling, 12-month period (from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
glycol dip tank with steam cleaning operation (B860)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

Pollutant: Ethylene Glycol
 TLV (mg/m3): 73.7
 Maximum Hourly Emission Rate (lbs/hr): 2.87 *
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 414.3
 MAGLC (ug/m3): 1755

* combined emission rate for P070, P071, and P072

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions 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.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling was performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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