



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

01/31/06

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

08-57-01-1823
Green Tokai Company
TIFFANY S. NOWICKI
55 ROBERT WRIGHT DRIVE
BROOKVILLE, OH 45309-6004

Dear TIFFANY S. NOWICKI:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by RAPCA within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

**Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact RAPCA.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PMU
RAPCA
Indiana
Kentucky



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 01/31/06

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: 08-57-01-1823 to:
Green Tokai Company
55 ROBERT WRIGHT DRIVE
BROOKVILLE, OH 45309-1902

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like K006, P003, P005, P010, P012, P015, P016, P020, P021, P022, P023, P025, P026, P027, P028, P029, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, and P054.

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:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
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 (i.e., postmarked) 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 reportable under OAC rule 3745-15-06(B) 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 (i.e., postmarked) 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 deviation reports shall satisfy the requirements 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. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

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 satisfies 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 (for the deviations so reported) the requirements 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:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any 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 (i.e., postmarked) 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. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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 and 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) and OAC rule 3745-77-07(A)(13)(b))

- 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(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 (i.e., postmarked) 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, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). 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 or Emissions Levels

Each IEU 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 from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which 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 Title V permit 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.

(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 (i.e., postmarked) 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; or
- 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; or
- 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 Enforceable Section

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

L001 - Maintenance Wash Tank (PTI #08-1813)
P001 - Rubber line 1 extrusion (PTI #08-1426)
P002 - Rubber Mixing (PTI #08-1425)
P011 - Rubber Finishing (PTI #08-1792)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as 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.

[Authority for term: OAC rule 3745-77-07(A)(13)]

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12-month summations.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

3. The permittee shall collect and record each month the following information for the entire facility:

- a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
- b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.3.a above).
- d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.3.b above).
- e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.
- f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.
- g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.
- h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

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

[Authority for Term: OAC Rule 3745-77-07(C)(1)]

A. State and Federally Enforceable Section (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
 - b. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC Rule 3745-77-07(C)(1)]

5. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

[Authority for Term: OAC Rule 3745-77-07(C)(1)]

6. Compliance with the emission limitations in Section A.2 above shall be determined in accordance with the following methods:

- a. Emission Limitation-
9.9 tons for each individual HAP/rolling, 12-month period

Applicable Compliance Method-
Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in Section A.3 above.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation-
24.9 tons for all HAPs combined/rolling, 12-month period

Applicable Compliance Method-
Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in Section A.3 above.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PVC LINE 3 AND FINISH PRIMER (K006)

Activity Description: PVC #3 EXTRUSION PRIMER STATION FOR AUTOMOTIVE SODY SIDE MOLDINGS

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>
K006- PVC Line 3 Extrusion/Finish; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-2156	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). The organic compound (OC) emissions from this emissions unit shall not exceed 38.4 lbs/day, 833.3 lbs/month and 5.0 tons/yr, including cleanup
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-2156 issued on 02/06/1991: A.III.2. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - e. The total OC emission rate for all the coatings and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials], in pounds.
 - f. The total number of days the emissions unit was in operation.
 - g. The average daily OC emission rate for all the coatings and cleanup materials employed, i.e., (e)/(f), in pounds per day (average).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2156, issued on 02/06/1991: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation reports that identify the days during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each month during which the average daily OC emission rate from the coatings and cleanup materials exceeded 38.4 pounds, and the actual average daily OC emission rate for each such month.
 - b. An identification of each month during which the OC emission rate from the coatings and cleanup materials exceeded 833.3 pounds, and the actual OC emission rate for each such month.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-2156, issued on 02/06/1991: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
38.4 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
833.3 lbs OC/month, including cleanup

Applicable Compliance Method-
Compliance with the monthly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
5.0 tons OC/yr, including cleanup

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: RUBBER LINE 1 SILICONE (P003)
Activity Description: RUBBER WEATHERSEAL LINE 1 SILICONE

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>
P003- Rubber Line 1 Silicone	OAC rule 3745-31-05(A)(3) PTI 08-1427	The organic compound (OC) emissions from this emissions unit shall not exceed 2.21 lbs/hr, 35.36 lbs/day and 4.43 tons/yr, from the use of coatings.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- This emissions unit does not employ cleanup materials.

II. Operational Restrictions

- The maximum annual silicone coatings usage for this emissions unit shall not exceed 1,276 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-1427 issued on 02/10/1988: A.III.2. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all the coatings employed, i.e., (d)/(e) in pounds per hour (average).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-1427 issued on 02/10/1988: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly OC emission rate from the coatings exceeded 2.21 pounds, and the actual average hourly OC emission rate for each such day.
 - b. An identification of each day during which the daily OC emission rate from the coatings exceeded 35.36 pounds, and the actual OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-1427 issued on 02/10/1988: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

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

2.a Emission Limitation-
2.21 lbs/hr of OC

Applicable Compliance Method-
Compliance with the hourly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2.b Emission Limitation-
35.36 lbs/day of OC

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2.c Emission Limitation-
4.43 tons/yr of OC

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 3 EXTRUSION/FINISH (P005)

Activity Description: LINE #3 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P005- PVC Line 3 Metal Adhesive; coating of metal parts with adhesive	OAC rule 3745-31-05(A)(3) PTI 08-04346	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.59 lbs/hr, 38.22 lbs/day (excluding cleanup), and 5.03 tons/yr, including cleanup.
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1. The gallon usage restriction specified by this rule is less stringent than the gallon usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- The 1.59 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum daily coating usage for this emissions unit shall not exceed 6 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04346]]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification for each cleanup material employed.
 - b. The number of gallons for each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.1.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 6 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 38.22 pounds, and the actual daily VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

1.a Emission Limitation-
less than or equal to 6 gallons/day of coating usage

Applicable Compliance Method-

Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

1.b Emission Limitation-
1.59 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation above may be determined by multiplying the maximum OC content of all coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr) for the emissions unit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

1.c Emission Limitation-
38.22 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

1.d Emission Limitation-
5.03 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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>
P005- PVC Line 3 Metal Adhesive; coating of metal parts with adhesive	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 (P005) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500E INJECTION MOLDING (P010)
Activity Description: 500E PVC INJECTION MOLDING

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>
P010- Injection Mold 500E	OAC rule 3745-31-05(A)(3) PTI 08-04434	The organic compound (OC) emissions from this emissions unit shall not exceed 1.67 lbs/hr, 40 lbs/day and 7.30 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2. The 1.67 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.67 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

- 1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
7.30 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.1 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04434]

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>
P010- Injection Mold 500E	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 (P010) 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 for all the injection mold groups combined. 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: Isopropanol

TLV (mg/m3): 983 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 5.8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,005 ug/m3

MAGLC (ug/m3): 23,406 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 2. 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: RUBBER LINE 2 SILICONE (P012)
Activity Description: RUBBER WEATHERSEAL LINE 2 SILICONE

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>
P012- Rubber Line 2 Silicone	OAC rule 3745-31-05(A)(3) PTI 08-1869	The organic compound (OC) emissions from this emissions unit shall not exceed 1.5 lbs/hr, 36 lbs/day and 4.6 tons/yr, from the use of coatings.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a. The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a This emissions unit does not employ cleanup materials.

II. Operational Restrictions

1. The maximum annual silicone coatings usage for this emissions unit shall not exceed 1,310 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-1869 issued on 10/04/1989: A.III.2. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content of each coating employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all the coatings employed, i.e., (d)/(e) in pounds per hour (average).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-1869 issued on 10/04/1989: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly OC emission rate from the coatings exceeded 1.5 pounds, and the actual average hourly OC emission rate for each such day.
 - b. An identification of each day during which the daily OC emission rate from the coatings exceeded 36 pounds, and the actual OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-1869 issued on 10/04/1989: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

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

2.a Emission Limitation-
1.5 lbs/hr of OC

Applicable Compliance Method-

Compliance with the hourly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2.b Emission Limitation-
36 lbs/day of OC

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2.c Emission Limitation-
4.6 tons/yr of OC

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 4 PRIMER (P015)

Activity Description: PVC LINE #4 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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>
P015- PVC Line 4 Extrusion/Finish; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-2645	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). The organic compound (OC) emissions from this emissions unit shall not exceed 27.12 lbs/day, 705 lbs/month and 4.23 tons/yr, including cleanup
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-2645 issued on 5/5/1993: A.III.2. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - e. The total OC emission rate for all the coatings and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials], in pounds.
 - f. The total number of days the emissions unit was in operation.
 - g. The average daily OC emission rate for all the coatings and cleanup materials employed, i.e., (e)/(f), in pounds per day (average).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2645 issued on 5/5/1993: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation reports that identify the days during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each month during which the average daily OC emission rate from the coatings and cleanup materials exceeded 27.12 pounds, and the actual average daily OC emission rate for each such month.
 - b. An identification of each month during which the OC emission rate from the coatings and cleanup materials exceeded 705 pounds, and the actual OC emission rate for each such month.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-2645 issued on 5/5/1993: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
27.12 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
705 lbs OC/month, including cleanup

Applicable Compliance Method-

Compliance with the monthly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
4.23 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

Facility Name: **GREEN TOKAI COMPANY LTD**

Facility ID: **08-57-01-1823**

Emissions Unit: **PVC LINE 4 PRIMER (P015)**

V. Testing Requirements (continued)

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 4 EXTRUSION (P016)

Activity Description: LINE #4 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P016- PVC Line 4 Extrusion; coating of metal parts with adhesive	OAC 3745-31-05(A)(3) PTI 08-2645	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 12.96 lbs/day (excluding cleanup) and 2.29 tons/yr, including cleanup. See Section A.II.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-2645 issued 05/05/1993: A.III.2 and 3. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.2.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2645 issued 05/05/1993: A.IV.2,3 and 4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 12.96 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-2645 issued 05/05/1993: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
less than or equal to 8 gallons/day of coatings usage

Applicable Compliance Method-
Compliance with the daily allowable coatings usage restriction above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
12.96 lbs VOC/day, excluding cleanup

Applicable Compliance Method-
Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
2.29 tons VOC/yr, including cleanup

Applicable Compliance Method-
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.3.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 5 EXTRUSION (P020)

Activity Description: LINE #5 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P020- PVC Line #5 Extrusion; coating of metal parts with adhesive	OAC 3745-31-05(A)(3) PTI 08-3427	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 11.71 lbs/day (excluding cleanup) and 2.40 tons/yr, including cleanup. See Section A.II.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-3427 issued 12/28/1995: A.III.2 and 3. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.2.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-3427 issued 12/28/1995: A.IV.2,3 and 4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 11.71 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-3427 issued 12/28/1995: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
less than or equal to 8 gallons/day of coatings usage

Applicable Compliance Method-
Compliance with the daily allowable coatings usage restriction above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
11.71 lbs VOC/day, excluding cleanup

Applicable Compliance Method-
Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
2.40 tons VOC/yr, including cleanup

Applicable Compliance Method-
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.3.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 8 PRIMER (P021)

Activity Description: PVC LINE #8 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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>
P021- PVC Line 8 Primer; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-04346	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). The organic compound (OC) emissions from this emissions unit shall not exceed 1.67 lbs/hr and 4.31 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

- The 1.67 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04346]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - e. The total OC emission rate for all the coatings and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials], in pounds.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

- 1.a Emission Limitation-
1.67 lbs OC/hr

Applicable Compliance Method-

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
4.31 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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>
P021- PVC Line 8 Primer; coating of plastic parts with primer	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 (P021) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: PVC LINE 5 PRIMER (P022)

Activity Description: PVC LINE #5 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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>
P022- PVC Line # 5 Extrusion/Finish; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-3427	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). The organic compound (OC) emissions from this emissions unit shall not exceed 12.15 lbs/day, 380 lbs/month and 2.17 tons/yr, including cleanup
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-3427 issued on 12/28/95: A.III.2. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - e. The total OC emission rate for all the coatings and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials], in pounds.
 - f. The total number of days the emissions unit was in operation.
 - g. The average daily OC emission rate for all the coatings and cleanup materials employed, i.e., (e)/(f), in pounds per day (average).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-3427 issued on 12/28/95: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation reports that identify the days during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each month during which the average daily OC emission rate from the coatings and cleanup materials exceeded 12.15 pounds, and the actual average OC emission rate for each such month.
 - b. An identification of each month during which the OC emission rate from the coatings and cleanup materials exceeded 380 pounds, and the actual OC emission rate for each such month.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-3427 issued on 12/28/95: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
12.15 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
380 lbs OC/month, including cleanup

Applicable Compliance Method-
Compliance with the monthly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
2.17 tons OC/yr, including cleanup

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE 8 EXTRUSION (P023)

Activity Description: LINE #8 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P023- PVC Line #8 Extrusion; coating of metal parts with adhesive	OAC 3745-31-05(A)(3) PTI 08-3427	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 16.49 lbs/day (excluding cleanup) and 3.2 tons/yr, including cleanup. See Section A.II.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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 #08-3427 issued 12/28/1995: A.III.2 and 3. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

2. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.2.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-3427 issued 12/28/1995: A.IV.2,3 and 4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 16.49 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #08-3427 issued 12/28/1995: A.V.2 and 3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

- 2.a Emission Limitation-
less than or equal to 8 gallons/day of coatings usage

Applicable Compliance Method-
Compliance with the daily allowable coatings usage restriction above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.b Emission Limitation-
16.49 lbs VOC/day, excluding cleanup

Applicable Compliance Method-
Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- 2.c Emission Limitation-
3.2 tons VOC/yr, including cleanup

Applicable Compliance Method-
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.3.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

[Authority for Term: OAC rule 3745-77-07(C)(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: PVC LINE #9 EXTRUSION (P025)

Activity Description: LINE #9 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P025- PVC Line #9 Extrusion; coating of metal parts with adhesive	OAC rule 3745-31-05(A)(3) PTI 08-3694	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 18.30 lbs/day (excluding cleanup) and 2.77 tons/yr, including cleanup.
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1. The gallon usage restriction specified by this rule is less stringent than the gallon usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum daily coatings usage for this emissions unit shall not exceed 3 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-3694]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:

- a. The company identification of each coating employed.
- b. The volume, in gallons, of each coating employed.
- c. The total volume, in gallons, for all the coatings employed.
- d. The VOC content for each coating employed, as applied, in pounds per gallon.
- e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

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

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.1.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 18.30 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

2. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 3 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

V. Testing Requirements

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

- 1.a Emission Limitation-
less than or equal to 3 gallons/day of coatings usage

Applicable Compliance Method-

Compliance with the daily allowable coatings usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
18.30 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

- 1.c** Emission Limitation-
2.77 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3694]

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: PVC LINE #9 PRIMER (P026)

Activity Description: PVC LINE #9 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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>
P026 - PVC Line 9 Primer; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-04346	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr, 40 lbs/day, and 4.3 tons/yr.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2. The 1.66 lbs/hr limitation was established for PTI purposes to reflect purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this permit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
4.3 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.1 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 2.** Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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>
P026 - PVC Line 9 Primer; coating of plastic parts with primer	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 (P026) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 2. 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: PVC LINE #10 EXTRUSION (P027)

Activity Description: LINE #10 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P027- PVC Line #10 Extrusion; coating of metal parts with adhesive	OAC 3745-31-05(A)(3) PTI 08-3834	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 18.03 lbs/day (excluding cleanup) and 2.74 tons/yr, including cleanup.
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1. The gallon usage restriction specified by this rule is less stringent than the gallon usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 3 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-3834]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.1.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 18.03 pounds, and the actual daily VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

2. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 3 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

V. Testing Requirements

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

1.a Emission Limitation-
less than or equal to 3 gallons/day of coatings usage

Applicable Compliance Method-

Compliance with the daily allowable coatings usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

1.b Emission Limitation-
18.03 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

1.c Emission Limitation-
2.74 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3834]

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: PVC LINE #10 PRIMER (P028)

Activity Description: PVC LINE #10 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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>
P028- PVC Line 10 Primer; coating of plastic parts with primer	OAC rule 3745-31-05(A)(3) PTI 08-04346	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). The organic compound (OC) emissions from this emissions unit shall not exceed 1.67 lbs/hr and 4.31 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	None, see Section A.II.1.

2. Additional Terms and Conditions

2. The 1.67 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

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.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04346]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each coating and cleanup material employed.
 - d. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - e. The total OC emission rate for all the coatings and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials], in pounds.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify the days during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (RAPCA) within 30 days of the deviation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

- 1.a Emission Limitation-
1.67 lbs OC/hr

Applicable Compliance Method-

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
4.31 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the sum of the 12 monthly OC emission rates for the calendar year, divided by 2,000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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>
P028- PVC Line 10 Primer; coating of plastic parts with primer	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 (P028) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: PVC LINE #2 ADHESIVE (P029)

Activity Description: LINE #2 EXTRUSION; COATING OF METAL WIRE WITH ADHESIVE

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>
P029- PVC Line 2 Primer; Metal Adhesive; coating of metal with adhesive	OAC rule 3745-31-05(A)(3) PTI 08-04346	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.10 lbs/hr (including cleanup), 50.96 lbs/day (excluding cleanup) and 6.94 tons/yr, including cleanup See Section A.II.1.
	OAC rule 3745-21-09(U)(2)(e)(i)	

2. Additional Terms and Conditions

2. The 2.10 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04346]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. The total VOC emissions for all the coatings and cleanup materials employed, in tons {[summation of (b x c) for all cleanup materials + summation of the daily VOC emission rates, from Section A.III.1.e above, for the calendar month], divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 50.96 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
2.10 lbs VOC/hr, including cleanup

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

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

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.b** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-

Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.c** Emission Limitation-
50.96 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.d** Emission Limitation-
6.94 tons VOC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.d of this permit, and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC 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>
P029- PVC Line 2 Primer; Metal Adhesive; coating of metal with adhesive	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 (P029) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: TVE #9 (P033)
Activity Description: FINISHING STATION FOR PLASTIC PARTS

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>
P033- TVE #9; Primer Coating Station and Other Hand/Bench Top finishing Operations	OAC rule 3745-31-05(A)(3) PTI 08-04346	The organic compound (OC) emissions from this emissions unit shall not exceed 1.67 lbs/hr, 40 lbs/day and 2.4 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material* employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation (b x c) for all coatings + summation of (b x c) for all cleanup materials].
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all the coatings and cleanup materials employed, i.e., (d)/(e), in pounds per hour (average).

* All cleanup materials employed in this emissions unit are considered photochemically reactive materials. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly OC emission rate from the coatings and cleanup materials exceeded 1.67 pounds, and the actual average hourly OC emission rate for each such day.
 - b. An identification of each day during which the daily OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
1.67 lbs/hr of OC

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.b** Emission Limitation-
40 lbs/day of OC

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

- 1.c** Emission Limitation-
2.4 tons/yr of OC

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

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>
P033- TVE #9; Primer Coating Station and Other Hand/Bench Top finishing Operations	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 (P033) 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500G INJECTION MOLD (P034)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P034 - Injection Mold 500G	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.c** Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 2.** Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P034 - Injection Mold 500G	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500B INJECTION MOLD (P035)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P035 - Injection Mold 500B	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P035 - Injection Mold 500B	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 610D INJECTION MOLD (P036)

Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P036- Injection Mold 610D	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons for each coating and cleanup material employed.
- c. The OC content for each coating and cleanup material employed, in pounds per gallon.
- d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:

- a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P036- Injection Mold 610D	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 2450 INJECTION MOLD (P037)
Activity Description: INJECTION MOLD OF PLASTIC SIDE MOLDING

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>
P037- Injection Mold 2450	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.c** Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 2.** Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P037- Injection Mold 2450	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500F INJECTION MOLD (P038)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P038 - Injection Mold 500F	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P038 - Injection Mold 500F	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500C INJECTION MOLD (P039)

Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P039 - Injection Mold 500C	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P039 - Injection Mold 500C	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500D INJECTION MOLD (P040)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P040 - Injection Mold 500D	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P040 - Injection Mold 500D	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 610C INJECTION MOLD (P041)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P041 - Injection Mold 610C	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

- 1.b** Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.c** Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 2.** Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P041 - Injection Mold 610C	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 610B INJECTION MOLD (P042)

Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P042 - Injection Mold 610B	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P042 - Injection Mold 610B	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500A INJECTION MOLD (P043)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P043 - Injection Mold 500A	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P043 - Injection Mold 500A	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 610A INJECTION MOLD (P044)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P044 - Injection Mold 610A	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P044 - Injection Mold 610A	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 610E INJECTION MOLD (P045)

Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P045 - Injection Mold 610E	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P045 - Injection Mold 610E	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 500H INJECTION MOLD (P046)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P046 - Injection Mold 500H	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P046 - Injection Mold 500H	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 2800 INJECTION MOLD (P047)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P047 - Injection Mold 2800	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P047 - Injection Mold 2800	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 3350 INJECTION MOLD (P048)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P048 - Injection Mold 3350	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P048 - Injection Mold 3350	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 1100 INJECTION MOLD (P049)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P049 - Injection Mold 1100	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P049 - Injection Mold 1100	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: 1750 INJECTION MOLD (P050)
Activity Description: INJECTION MOLDING OF PLASTIC SIDE MOLDING

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>
P050 - Injection Mold 1750	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

6. The OC content of the primer shall not exceed 6.42 pounds of OC per gallon.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.
 - b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
 - c. The rolling, 12-month summation of the monthly primer usage, in gallons.
 - d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements (continued)

1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

1.c Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P050 - Injection Mold 1750	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 units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' 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): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: RUBBER LINE 4 SILICONE (P051)
Activity Description: SILICONE COATING OF EXTRUDED RUBBER

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>
P051- Silicone spray station	OAC rule 3745-31-05(A)(3) PTI 08-04279	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr, 40 lbs/day and 7.30 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2. The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds, and the actual OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

- 1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
7.30 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.1 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

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>
P051- Silicone spray station	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 (P051) 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 for all the injection mold groups combined. 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): 572.597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.66 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,486 ug/m3

MAGLC (ug/m3): 13,633.26 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: RUBBER LINE 3 SILICONE (P052)
Activity Description: SILICONE COATING ON EXTRUDED RUBBER

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>
P052- line #3- Silicone spray station	OAC rule 3745-31-05(A)(3) PTI 08-04279	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr, 40 lbs/day and 7.30 tons/yr, including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2. The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds, and the actual OC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

2. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

V. Testing Requirements

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

- 1.a Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

- 1.b Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
7.30 tons OC/yr, including cleanup

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.1 of this permit, and shall be the sum of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

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>
P052- line #3- Silicone spray station	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 (P052) 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 for all the injection mold groups combined. 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): 572.597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.66 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,486 ug/m3

MAGLC (ug/m3): 13,633.26 ug/m3

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:

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. 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: TPO #2 ADHESIVE (P053)

Activity Description: LINE #2 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P053 - TPO Line 2 Metal Adhesive	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-31-05(C). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.21 lbs/hr and 53.12 lbs/day (excluding cleanup).
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 2.21 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

- The maximum annual coating usage rate for this emissions unit not exceed 1128 gallons based on a rolling, 12-month summation of the coating usage rates.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

3. The maximum annual cleanup material usage rate for this emissions unit not exceed 71 gallons based on a rolling, 12-month summation of the coating usage rates.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]
4. The VOC content for each coating employed, as applied, shall not exceed 6.64 pounds of VOC per gallon.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]
5. The VOC content for each cleanup material employed, shall not exceed 7.28 pounds of VOC per gallon.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]
2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate for each month.
 - b. The cleanup material usage rate for each month.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the coating usage rates.
 - e. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the cleanup material usage rates.
 - f. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate and the cumulative cleanup material usage for each calendar month.
 - g. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., [summation of (1.d x 2.d) for all coatings + summation of (2.c x 2.e) for all cleanup materials] divided by 2000 lbs/ton.[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coating and cleanup material, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 53.12 pounds, and the actual VOC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month cleanup material usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

7. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
2.21 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.b** Emission Limitation-
53.12 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.c** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-

Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.d** Emission Limitation-
4.0 tons VOC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.g. of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.e** Emission Limitation-
6.64 lbs VOC/gallon of coating

7.28 lbs VOC/gallon of cleanup material

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.d for all coating and Section III 2.c for all cleanup material. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P053 - TPO Line 2 Metal Adhesive	None	None

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: TPO #3 ADHESIVE (P054)

Activity Description: LINE #3 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE

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>
P054 - TPO Line 3 Metal Adhesive	OAC rule 3745-31-05(A)(3) PTI 08-04672	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-31-05(C). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.21 lbs/hr and 53.12 lbs/day (excluding cleanup).
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- The 2.21 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

- The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

- The maximum annual coating usage rate for this emissions unit not exceed 1128 gallons based on a rolling, 12-month summation of the coating usage rates.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

II. Operational Restrictions (continued)

3. The maximum annual cleanup material usage rate for this emissions unit not exceed 71 gallons based on a rolling, 12-month summation of the coating usage rates.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]
4. The VOC content for each coating employed, as applied, shall not exceed 6.64 pounds of VOC per gallon.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]
5. The VOC content for each cleanup material employed, shall not exceed 7.28 pounds of VOC per gallon.
[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 08-04672]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].
[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]
2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate for each month.
 - b. The cleanup material usage rate for each month.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.
 - d. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the coating usage rates.
 - e. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the cleanup material usage rates.
 - f. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate and the cumulative cleanup material usage for each calendar month.
 - g. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., [summation of (1.d x 2.d) for all coatings + summation of (2.c x 2.e) for all cleanup materials] divided by 2000 lbs/ton.
[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

2. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coating and cleanup material, i.e., for VOC content. 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 following the end of the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 53.12 pounds, and the actual VOC emission rate for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month cleanup material usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

6. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

7. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
2.21 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.b** Emission Limitation-
53.12 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.c** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-

Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.d** Emission Limitation-
4.0 tons VOC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.g. of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

- 1.e** Emission Limitation-
6.64 lbs VOC/gallon of coating

7.28 lbs VOC/gallon of cleanup material

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.d for all coating and Section III 2.c for all cleanup material. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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>
P054 - TPO Line 3 Metal Adhesive	None	None

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Green Tokai Company
Premise Number	08-57-01-1823
What makes this facility a Title V facility?	Volatile Organic Compound (VOC), as part of this Title V renewal the facility has requested synthetic minor limits for HAPs.
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Y
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.2, A.3, A.4, and A.5. Renewal		OAC rule 3745- 35- 07(B)	The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for the entire facility will be required to monitor compliance.

- C **Instructions for Part II:**
 Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State & Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												

K006, P015, P021, P022, P026 and P028		21-07(G)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>The use of photochemically reactive materials is prohibited.</p> <p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
P016, P020, P023, P029, P053, P054	The maximum daily coating usage shall not exceed 8 gallons.	21-09(U)(2)(e)(i)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR-The maximum daily coating usage shall not exceed 8 gallons, appropriate monitoring, record keeping and reporting requirements have been specified for the operational restriction and CAM is not applicable.</p> <p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p> <p>The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
K006	38.4 lbs OC/day	31-05-(A)(3)	PTI 08-2156	N	N	Y	Y	N	Y	Y	Y	Y	N	N	<p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>

	833.3 lbs OC/month	31-05- (A)(3)	PTI 08- 2156	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	5.0 tons OC/yr	31-05- (A)(3)	PTI 08- 2156	N	N	N	N	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
P003, P012	2.21 lbs OC/hr	31-05- (A)(3)	PTI 08- 1427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	35.36 lbs OC/day	31-05- (A)(3)	PTI 08- 1427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	4.43 tons OC/yr	31-05- (A)(3)	PTI 08- 1427	N	N	N	N	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
		21- 07(G)(2)													The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P005	1.59 lbs VOC/hr	31-05- (A)(3)	PTI 08- 04346	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	38.22 lbs VOC/day	31-05- (A)(3)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
	5.03 tons VOC/yr	31-05- (A)(3)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P005	The maximum daily coating usage shall not exceed 6 gallons.	31-05- (A)(3)	PTI 08- 04346	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
P005, P025, P027		21- 09(U)(2) (e)(i)													The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

P010	1.67 lbs OC/hr	31-05- (A)(3)	PTI 08- 04434	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	40 lbs OC/day	21- 07(G)(2)	PTI 08- 04434	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	7.30 tons OC/yr	31-05- (A)(3)	PTI 08- 04434	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050	1.66 lbs OC/hr	31- 05(A)(3)	PTI 08- 04672	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	40 lbs OC/day	31- 05(A)(3)	PTI 08- 04672	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.

	The OC emissions rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling 12-month summation of the monthly OC emissions.	31-05(C)	PTI 08-04672	N	Y	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. OR- appropriate monitoring, record keeping, and reporting requirements have been specified for the operation restriction. CAM is not applicable.
P010, P012, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052		21-07(G)(2)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	The pound per hour emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
P012	1.5lbs OC/hr	31-05-(A)(3)	PTI 08-1869	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed

	36 lbs OC/day	31-05- (A)(3)	PTI 08- 1869	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	4.6 tons OC/yr	31-05- (A)(3)	PTI 08- 1869	N	Y	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
P015	27.12 lbs OC/day	31-05- (A)(3)	PTI 08- 2645	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	705 lbs OC/month	31-05- (A)(3)	PTI 08- 2645	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	4.23 tons OC/yr	31-05- (A)(3)	PTI 08- 2645	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.

P016	12.96 lbs OC/day	31-05- (A)(3)	PTI 08- 2645	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	2.29 tons OC/yr	31-05- (A)(3)	PTI 08- 2645	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P020	11.71 lbs OC/day	31-05- (A)(3)	PTI 08- 3427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	2.40 tons OC/yr	31-05- (A)(3)	PTI 08- 3427	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P021, P026, and P028	1.67 lbs OC/hr	31-05- (A)(3)	PTI 08- 04346	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	4.31 tons OC/yr	31-05- (A)(3)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P022	12.15 lbs OC/day	31-05- (A)(3)	PTI 08- 3427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed

	380 lbs/month	31-05-(A)(3)	PTI 08-3427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	2.17 tons OC/yr	31-05-(A)(3)	PTI 08-3427	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P023	16.49 lbs VOC/day	31-05-(A)(3)	PTI 08-3427	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	3.2 tons VOC/yr	31-05-(A)(3)	PTI 08-3427	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P025	18.30 lbs VOC/day	31-05-(A)(3)	PTI 08-3694	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	2.77 tons VOC/yr	31-05-(A)(3)	PTI 08-3694	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.

	The maximum daily coating usage shall not exceed 3 gallons.	31-05-(A)(3)	PTI 08-3694	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
P025 and P027		21-09(U)(2)(e)(i)													The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P027	18.03 lbs VOC/day	31-05-(A)(3)	PTI 08-3834	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	2.74 tons VOC/yr	31-05-(A)(3)	PTI 08-3834	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
	The maximum daily coating usage shall not exceed 3 gallons.	31-05-(A)(3)	PTI 08-3834	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
P029	2.10 lbs VOC/hr	31-05-(A)(3)	PTI 08-04346	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.

	50.96 lbs VOC/day	31-05- (A)(3)	PTI 08- 04346	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed
	6.94 tons VOC/yr	31-05- (A)(3)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.
P031, P032, P033	1.67 lbs OC/hr	31-05- (A)(3)	PTI 08- 04346	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	40 lbs OC/day	21- 07(G)(2)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required
	2.4 tons OC/yr	31-05- (A)(3)	PTI 08- 04346	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required
P051 and P052	1.66 lbs OC/hr	31-05- (A)(3)	PTI 08- 04279	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	40 lbs OC/day	21- 07(G)(2)	PTI 08- 04279	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required
	7.3 tons OC/yr	31-05- (A)(3)	PTI 08- 04279	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required
P053 and P054	2.21 lbs VOC/hr	31-05- (A)(3)	PTI 08- 04672	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, recording and reporting and testing requirements to ensure compliance with this limit.
	53.12 lbs VOC/day	31-05- (A)(3)	PTI 08- 04672	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required.

	The VOC emissions rate from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling 12-month summation of the monthly VOC emissions.	31-05(C)	PTI 08-04672	N	Y	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. OR- appropriate monitoring, record keeping, and reporting requirements have been specified for the operation restriction. CAM is not applicable.
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EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65

would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.