



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

02/29/00

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

03-32-01-0055  
Findlay Industries - Gardner Molded Products Division  
Mr. Doug C Kuenzli  
4000 Fostoria Road  
Findlay, OH 45840-1087

Dear Doug C Kuenzli:

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 Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

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 or comments concerning this draft Title V permit, please contact Northwest District Office.**

Very truly yours,

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

cc: USEPA (electronic)  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Northwest District Office  
Indiana  
Michigan



## Ohio EPA

State of Ohio Environmental Protection Agency

### DRAFT TITLE V PERMIT

Issue Date: 02/29/00

Effective Date:

Expiration Date:

*The duration of this permit will be five years.*

This document constitutes issuance to:

Findlay Industries - Gardner Molded Products Division  
2100 Fostoria Road  
Findlay, OH 45840

of a Title V permit for Facility ID: 03-32-01-0055

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

R003 (W/C Coupe Bond )

Spray Booth - Apply water-based adhesive to various substrates

R004 (W/C Sedan Bond)

Spray Booth - Apply water-based adhesive to various substrates

R005 (C/K rh Bond)

Spray Booth - Apply solvent-based adhesive to various substrates

R006 (C/K lh Bond)

Spray Booth - Apply solvent-based adhesive to various substrates

R007 (W/C Sedan Edge-turn)

Spray Booth - Apply solvent-based adhesive to various substrates

R008 (W/C Coupe Edge-turn)

Spray Booth - Apply solvent-based adhesive to various substrates

R009 (W-Car Cell #1)

Spray Area-Apply solvent-based adhesive to various substrates

R010 (W-Car Cell #2)

Spray Area-Apply solvent-based adhesive to various substrates

R011 (W-Car Cell #3)

Spray Area-Apply solvent-based adhesive to various substrates

R012 (W-Car Cell #4)  
Spray Area-Apply solvent-based adhesive to various substrates

R013 (W-Car Cell #5)  
Spray Area-Apply solvent-based adhesive to various substrates

R014 (W-Car Cell #6)  
Spray Area-Apply solvent-based adhesive to various substrates

R015 (Roll Coater)  
Roll Coater - applies polyester resin to substrate

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 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

## OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If 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 CFR 68.215(a), the permittee shall submit either of the following:

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

**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.

**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.

## 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 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.

## 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.

## 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 appropriate Ohio EPA District Office or local air agency and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **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.

### **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).

## 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.

## 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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## 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.

## **18. 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.

## **B. State Only Enforceable Section**

### **1. 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.

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

The permittee shall submit required reports in the following manner:

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

### **3. 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).

### **4. 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.

### **5. 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.

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

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

None

### B. State Only Enforceable Section

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

Hydraulic forming press #1 (P003); Hydraulic forming press #2 (P004); Hydraulic forming press #3 (P005); Hydraulic forming press #4 (P006); Hydraulic forming press #5 (P007); Hydraulic forming press #6 (P008); Hydraulic forming press #7 (P009); Hydraulic forming press #8 (P010); Hydraulic forming press #9 (P011); Hydraulic forming press #10 (P012); Hetinga press (Z003); Resin storage tank (Z002); Rupp unit #1 (Z010); Rupp unit #2 (Z011); and Lanley oven (Z012).

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 a PTI for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** W/C Coupe Bond (R003)

**Activity Description:** Spray Booth - Apply water-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-13303)	5.26 pounds organic compounds (OC)/hour and 18.94 tons OC/year (from adhesive coating usage)  6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 5.26 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

##### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each adhesive coating employed;
  - b. documentation on whether or not each adhesive coating employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the OC content of each adhesive coating employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the adhesive coatings employed [summation of (c x d) for all adhesive coatings], in pounds.
2. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.
3. The permittee shall collect and record annually the following information for this emissions unit:
  - a. the total OC emission rate for all the cleanup materials employed [summation of the monthly OC emissions (from section 2.d) for the calendar year], in tons; and
  - b. the total OC emission rate for all the adhesive coatings employed [summation of the monthly OC emissions (from section 1.d) for the calendar year], in tons.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.
2. The permittee shall submit annual reports which specify the total OC emissions from the adhesive coatings and from the cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the monthly OC limitation of 6.44 pounds.

### **V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
5.26 pounds OC/hour, 18.94 tons OC/year (from adhesive coating usage)

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

Compliance with the annual OC limitation shall be based upon the monitoring and record keeping requirements specified in sections A.III.1 and A.III.3 of this permit.

- 1.b** Emission Limitation:  
6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly and annual emission limitations based upon the monitoring and record keeping requirements specified in section A.III.2 and 4 of this permit.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.83  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 536  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W/C Sedan Bond (R004)

**Activity Description:** Spray Booth - Apply water-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-13303)	5.26 pounds organic compounds (OC)/hour and 18.94 tons OC/year (from adhesive coating usage)  6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 5.26 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

##### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each adhesive coating employed;
  - b. documentation on whether or not each adhesive coating employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the OC content of each adhesive coating employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the adhesive coatings employed [summation of (c x d) for all adhesive coatings], in pounds.
2. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.
3. The permittee shall collect and record annually the following information for this emissions unit:
  - a. the total OC emission rate for all the cleanup materials employed [summation of the monthly OC emissions (from section 2.d) for the calendar year], in tons; and
  - b. the total OC emission rate for all the adhesive coatings employed [summation of the monthly OC emissions (from section 1.d) for the calendar year], in tons.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.
2. The permittee shall submit annual reports which specify the total OC emissions from the adhesive coatings and from the cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the monthly OC limitation of 6.44 pounds.

### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
5.26 pounds OC/hour, 18.94 tons OC/year (from adhesive coating usage)

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

Compliance with the annual OC limitation shall be based upon the monitoring and record keeping requirements specified in sections A.III.1 and A.III.3 of this permit.

- 1.b** Emission Limitation:  
6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly and annual emission limitations based upon the monitoring and record keeping requirements specified in section A.III.2 and 4 of this permit.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.83  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 536  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** C/K rh Bond (R005)

**Activity Description:** Spray Booth - Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-13303)	5.26 pounds organic compounds (OC)/hour and 18.94 tons OC/year (from adhesive coating usage)  6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 5.26 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

##### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each adhesive coating employed;
  - b. documentation on whether or not each adhesive coating employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the OC content of each adhesive coating employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the adhesive coatings employed [summation of (c x d) for all adhesive coatings], in pounds.
2. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.
3. The permittee shall collect and record annually the following information for this emissions unit:
  - a. the total OC emission rate for all the cleanup materials employed [summation of the monthly OC emissions (from section 2.d) for the calendar year], in tons; and
  - b. the total OC emission rate for all the adhesive coatings employed [summation of the monthly OC emissions (from section 1.d) for the calendar year], in tons.

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.
2. The permittee shall submit annual reports which specify the total OC emissions from the adhesive coatings and from the cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the monthly OC limitation of 6.44 pounds.

### **V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
5.26 pounds OC/hour, 18.94 tons OC/year (from adhesive coating usage)

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

Compliance with the annual OC limitation shall be based upon the monitoring and record keeping requirements specified in sections A.III.1 and A.III.3 of this permit.

- 1.b** Emission Limitation:  
6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly and annual emission limitations based upon the monitoring and record keeping requirements specified in section A.III.2 and 4 of this permit.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.83  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 536  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** C/K lh Bond (R006)

**Activity Description:** Spray Booth - Apply solvent-based adhesive to various substrates

### A. State and Federally Enforceable Section

#### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-13303)	5.26 pounds organic compounds (OC)/hour and 18.94 tons OC/year (from adhesive coating usage)  6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

#### 2. Additional Terms and Conditions

- The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- The 5.26 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

#### II. Operational Restrictions

- The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each adhesive coating employed;
  - b. documentation on whether or not each adhesive coating employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the OC content of each adhesive coating employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the adhesive coatings employed [summation of (c x d) for all adhesive coatings], in pounds.
2. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each cleanup material employed;
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in pounds per gallon, as applied; and
  - e. the total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.
3. The permittee shall collect and record annually the following information for this emissions unit:
  - a. the total OC emission rate for all the cleanup materials employed [summation of the monthly OC emissions (from section 2.d) for the calendar year], in tons; and
  - b. the total OC emission rate for all the adhesive coatings employed [summation of the monthly OC emissions (from section 1.d) for the calendar year], in tons.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.
2. The permittee shall submit annual reports which specify the total OC emissions from the adhesive coatings and from the cleanup materials. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the monthly OC limitation of 6.44 pounds.

### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
5.26 pounds OC/hour, 18.94 tons OC/year (from adhesive coating usage)

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

Compliance with the annual OC limitation shall be based upon the monitoring and record keeping requirements specified in sections A.III.1 and A.III.3 of this permit.

- 1.b** Emission Limitation:  
6.44 pounds OC/month, 0.04 ton OC/year (from cleanup material usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly and annual emission limitations based upon the monitoring and record keeping requirements specified in section A.III.2 and 4 of this permit.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.83  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 536  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W/C Sedan Edge-turn (R007)

**Activity Description:** Spray Booth - Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-8801)	8.82 pounds organic compounds (OC)/hour (from adhesive coating usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 8.82 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

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

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:  
8.82 pounds OC/hour

Applicable Compliance Method:  
The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

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

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 8.82  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,054  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W/C Coupe Edge-turn (R008)

**Activity Description:** Spray Booth - Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)	less stringent than the limitation established pursuant to OAC rule 3745-31-05
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-8801)	8.82 pounds organic compounds (OC)/hour (from adhesive coating usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 8.82 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

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

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:  
8.82 pounds OC/hour

Applicable Compliance Method:  
The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

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

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 8.82  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,054  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #1 (R009)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  6.18 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.31 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 6.18 pounds OC/hour and 0.31 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
6.18 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
0.31 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 1.125 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 5  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 995  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #2 (R010)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  6.18 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.31 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 6.18 pounds OC/hour and 0.31 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
6.18 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
0.31 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 1.125 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 5  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 995  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #3 (R011)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  6.18 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.31 pound particulate emissions (PE)/hour

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 6.18 pounds OC/hour and 0.31 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

**II. Operational Restrictions**

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
6.18 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
0.31 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 1.125 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 5  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 995  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #4 (R012)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  6.18 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.31 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 6.18 pounds OC/hour and 0.31 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
6.18 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
0.31 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 1.125 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 5  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 995  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #5 (R013)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  4.8 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.24 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 4.8 pounds OC/hour and 0.24 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
4.8 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
024 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 0.875 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 4.4  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 875  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** W-Car Cell #6 (R014)

**Activity Description:** Spray Area-Apply solvent-based adhesive to various substrates

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)  OAC rule 3745-31-05 (PTI No. 03-9982)	less stringent than the limitation established pursuant to OAC rule 3745-31-05  4.8 pounds organic compounds (OC)/hour (from adhesive coating usage)  0.24 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 4.8 pounds OC/hour and 0.24 pound PE/hour emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

#### II. Operational Restrictions

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for this emissions unit:
  - a. the company's identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the monthly record indicating noncompliance.

#### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
4.8 pounds OC/hour

Applicable Compliance Method:

The permittee shall determine compliance with the hourly limitation by multiplying the maximum OC content of all the adhesive coatings employed (pounds per gallon) by the maximum adhesive coating usage rate (gallons per hour).

- 1.b Emission Limitation:  
024 pound PE/hour

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation above as follows:

$PE \text{ (lbs/hour)} = \text{maximum solids content (lbs/gallon) of all the adhesive coatings} \times \text{maximum gallon usage rate} \times (1 - Te)$

where:

maximum solids content = 1.4 lbs solids/gallon of adhesive coating

maximum gallon usage rate = 0.875 gallon/hour

Te = transfer efficiency (80%)

If required, the permittee shall demonstrate compliance pursuant to Method 5 of 40 CFR Part 60, Appendix A.

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

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 4.4  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 875  
 MAGLC (ug/m3): 4,190

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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:** Roll Coater (R015)  
**Activity Description:** Roll Coater - applies polyester resin to substrate

#### 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>
polyester resin roll coater, with thermal oxidizer	OAC rule 3745-21-07(G)(2)	See A.2.d.
	OAC rule 3745-17-11(B)	none (refer to section A.I.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(A)	none (refer to section A.I.2.b of the terms and conditions of this permit)
	OAC rule 3745-31-05 (PTI No. 03-10292)	1.26 pounds organic compounds (OC)/hour (from adhesive coating usage)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Hancock County, which is identified as a P-2 county.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c The 1.26 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.d The OC emissions from this emissions unit shall be reduced by at least 85% by employing a thermal oxidizer that has a minimum destruction efficiency of not less than 90% for OC.

##### II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1600 degrees Fahrenheit.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1550 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit is in operation.

### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
1.26 pounds OC/hour

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission limitation above based upon on the following equation:

$$E \text{ (lbs/hour)} = \text{Mu} \times \text{Moc} \times \text{Ef} \times (1 - \text{Ce})$$

Where:

Mu = maximum adhesive coating usage (gallons/hour)

Moc = maximum OC content of all the adhesive coatings employed (lbs/ gallon)

Ef = emission factor (0.03 lb OC/lb of monomer)\*

Ce = control efficiency of the thermal oxidizer (93.6%)\*\*

If required, the permittee shall demonstrate compliance pursuant to Method 25 of 40 CFR Part 60, Appendix A.

\* The emission factor is based on information supplied by the manufacturer of the adhesive coatings.

\*\* The OC control efficiency was based upon the results of an emission testing conducted on this emissions unit.

## V. Testing Requirements (continued)

- 1.b** Emission Limitation:  
85% overall and 90% destruction efficiencies for OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitations above pursuant to the methods and procedures as specified in Section A.V.3 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings.
- 3.** Within 6 months following the issuance of this permit and within 6 months prior to permit renewal, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order to demonstrate compliance with the overall control efficiency for OCs, which will be determined as the product of the capture efficiency and the destruction efficiency of the thermal oxidizer. The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The destruction efficiency shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds between the inlet and outlet of the thermal oxidizer. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 4.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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

A comprehensive written report on the results of the emissions tests shall be signed and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## 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>
polyester resin roll coater, with thermal oxidizer	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit was evaluated based on the actual materials (adhesive coatings and cleanup materials) specified by the permittee in the permit to install application. The emission limitation specified in this permit was established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene  
 TLV (ug/m3): 213,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.26  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 74  
 MAGLC (ug/m3): 5,071

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

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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

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