



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

03/04/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-22-02-0042

Ford Motor Company Sandusky Plastics Plant
Richard H. Frasca
3020 Tiffin Avenue
Sandusky, OH 44870-0000

Dear Richard H. Frasca:

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
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Michigan



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 03/04/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Ford Motor Company Sandusky Plastics Plant
3020 Tiffin Avenue
Sandusky, OH 44870-0000

of a Title V permit for Facility ID: 03-22-02-0042

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B004 (77mmbtu gas/oil)

Natural Gas/Oil Fired Boiler (77mmbtu gas/oil)

P056 (Thermal Cure Oven)

Thermal cure oven associated with flowcoater booths

R022 (DECO paint booth)

DECO paint booth #2

R027 (UV Cure Hardcoat)

UV Cure Hardcoat system spray booth

R038 (DECO up-spray)

DECO spray booth #3

R050 (UV Clearcoat)

UV Clearcoat/Hardcoat spray booth system #2 for plastic parts

R051 (UV Clearcoat)

UV Clearcoat/Hardcoat spray booth system #3 for plastic parts

R052 (Basecoat spray)

DN-101 Second surface decorating: Basecoat spray booth for plastic parts

R053 (Topcoat spray)

DN-101 Second surface decorating: Topcoat spray booth for plastic parts

R054 (Flowcoater)

Thermal cure flowcoater to clearcoat plastic parts

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

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

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

7. Fees

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

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 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.

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. 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 Only Enforceable Section

1. ASEA adhesive (R028); ASEA adhesive (R029); ASEA adhesive (R030); ASEA adhesive (R031); ASEA (R037); ASEA adhesive (R039); ASEA adhesive (R040); ASEA adhesive (R042); ASEA urethane (P052);

(B025); 9.25 million BTU/hour boiler (B026); 3.00 million BTU/hour boiler (B027); 4.5 million BTU/hour boiler adhesive (R045); maintenance parts cleaners (Z005); diesel-fired water pumps (Z006); diesel fuel and carbon cannister (Z004); ASEA adhesive (R055); and ASEA adhesive (R056).

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 77mmbtu gas/oil (B004)
Activity Description: Natural Gas/Oil Fired Boiler (77mmbtu gas/oil)

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>
77 mmBtu/hour natural gas-fired boiler with number 2 fuel oil as back-up	OAC rule 3745-17-10(B)(1)	0.020 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-06(D)	1.6 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs of sulfur dioxide/mmBtu of actual heat input.
- The permittee shall burn only natural gas and/or number 2 fuel oil in this emissions unit .

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the NWDO in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the NWDO within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method: When firing natural gas, compliance shall be determined by multiplying an emission factor of 6.2 lbs of particulates/mm³cu.ft. by the emissions unit's maximum hourly fuel consumption rate (77,000 cu. ft./hr) and dividing by the emissions unit's maximum heat input capacity (77 mmBtu/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1.

When firing oil, compliance shall be based upon an emission factor of 2 lbs PE/1000 gallon of oil, as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2.

If required, the permittee shall demonstrate compliance with this emission limitation (when firing # 2 fuel oil) in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation: 20 percent opacity, as a six-minute average

Applicable Compliance Method: Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.c Emission Limitation: 1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method: When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation (when firing # 2 fuel oil) in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6C.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
77 mmBtu/hour natural gas-fired boiler with number 2 fuel oil as back-up	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Thermal Cure Oven (P056)
Activity Description: Thermal cure oven associated with flowcoater booths

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>
thermal cure oven associated with dual coating spray booth (emissions unit R054)	OAC rule 3745-21-07(G)(1)	3.0 pounds/hr and 15.0 pounds/day of organic compounds (OC)
	OAC rule 3745-31-05 PTI No. 03-9956	See section A.I.2.a of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:
 - 1.a For all coatings employed:
 - i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings employed].

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

1.b For all cleanup materials employed :

- i. the company identification of each cleanup material* employed;
- ii. the quantity of each cleanup material employed, in gallons;
- iii. the OC content of each cleanup material employed, in pounds/gallon;
- iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
- v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials employed].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

1.c For all coatings and cleanup materials employed:

- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
- ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

2. The permittee shall collect and record the following information for each day for this emissions unit:

- a. The total potential (prior to applying the booth/oven "split") uncontrolled daily organic compound emission rate for all coatings employed in the coating operation associated with this emissions unit (R054), multiplied by the maximum percentage of the emissions associated with this emissions unit as defined below (see section A.III.3), in pounds.
- b. The total number of hours this emissions unit was in operation. (This number should be the same as the number of hours the associated coating operation was in operation.)
- c. The average hourly organic compound emission rate, i.e., a/b, in pounds per hour (average).

3. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R054), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon calculations provided by the company that incorporated information from the coating supplier. The "split" of organic compound emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight%).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.

IV. Reporting Requirements (continued)

- 2.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation of the daily OC emissions

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III of the terms and conditions of this permit.
 - 1.b** Emission Limitation:
3.0 pounds/hour OC
15.0 pounds/day OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III of the terms and conditions of this permit.
- 2.** Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable OC emission limitations of 3 lbs/hr and 15 lbs/day.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25, 40 CFR Part 50, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

An OC emissions test also shall be conducted at the inlet of this oven (P056) to determine the uncontrolled mass rate of OC emissions for this emissions unit, for purposes of determining the oven/booth split as defined in section A.III.2 of this permit. To determine the oven/booth split, the permittee shall employ the following equations during the period of emissions testing:

$$UOC_{\text{booth}} = TOC_{\text{booth}} - UOC_{\text{oven}}$$

$$B_{\text{split}} (\text{wt}\%) = (UOC_{\text{booth}}/TOC_{\text{booth}}) \times 100\%$$

$$O_{\text{split}} (\text{wt}\%) = 100 - B_{\text{split}}$$

Where,

UOC_{booth} : uncontrolled OC emissions from the booth (R054) [lbs/t]

TOC_{booth} : total potential (prior to applying the booth/oven split) uncontrolled OC emission rate for all coatings employed in the spray booth (R054) [lbs/t]

UOC_{oven} : uncontrolled VOC emissions from this emissions unit (P054), in lbs/t, [this value is obtained from the results of the stack testing required above]

B_{split} : the portion of the "TOC_Booth" emitted in the booth (wt%)

O_{split} : the portion of the "TOC_Booth" emitted in the oven (wt%)

t : the duration of the emissions testing, in minutes or hours

V. Testing Requirements (continued)

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

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

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

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>
thermal cure oven associated with dual coating spray booth (emissions unit R054)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "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 and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: diacetone alcohol*

TLV (ug/m3): 238,000

Maximum Hourly Emission Rate (lbs/hr): 3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133.9

MAGLC (ug/m3): 5,667

*It was conservatively assumed that, for this emissions unit, the compound in the coating materials with the lowest TLV was assumed to be the only air toxic emitted and it was emitted at the maximum hourly emission rate (i.e., the emission rate was not broken down into individual constituent proportions based on the coating formulation data).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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: DECO paint booth (R022)
Activity Description: DECO paint booth #2

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>
DECO coating operation #2 for plastic parts	OAC rule 3745-21-07(G)(2)	8.0 pounds/hr and 40 pounds/day of organic compounds (OC)
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	See section A.II.1.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.b of the terms and conditions of this permit.
		None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any 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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

1.a For all coatings employed:

- i. the company identification of each coating employed;
- ii. the quantity of each coating employed, in gallons;
- iii. the OC content of each coating employed, in pounds/gallon;
- iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
- v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

1.b For all cleanup materials employed :

- i. the company identification of each cleanup material* employed;
- ii. the quantity of each cleanup material employed, in gallons;
- iii. the OC content of each cleanup material employed, in pounds/gallon;
- iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
- v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

1.c For all coatings and cleanup materials employed:

- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
- ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

2. The permittee shall collect and record the following information each day for this emissions unit :

- a. the company identification of each coating and/or cleanup material employed;
- b. the determination of whether or not each cleanup material is a photochemically reactive material;
- c. the quantity of each coating employed, in gallons;
- d. the OC content of each coating employed, in pounds/gallon, as applied*;
- e. the OC emission rate for each coating employed, in pounds [c X d];
- f. the total OC emission rate for all coatings employed, in pounds [summation of e for all coatings];
- g. the total number of hours the emissions unit was in operation; and
- h. the average hourly OC emission rate for all coatings, in pounds/hour (daily average) [f/g].

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
2. The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.
 - 1.b Emission Limitation:
8.0 pounds/hour OC
40.0 pounds/day OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.2. of the terms and conditions of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DECO coating operation #2 for plastic parts	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: UV Cure Hardcoat (R027)
Activity Description: UV Cure Hardcoat system spray booth

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>
UV cure hardcoat coating operation for plastic parts	OAC rule 3745-21-07(G)	None, refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

1.a For all coatings employed:

- i. the company identification of each coating employed;
- ii. the quantity of each coating employed, in gallons;
- iii. the OC content of each coating employed, in pounds/gallon;
- iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
- v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

1.b For all cleanup materials employed :

- i. the company identification of each cleanup material* employed;
- ii. the quantity of each cleanup material employed, in gallons;
- iii. the OC content of each cleanup material employed, in pounds/gallon;
- iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
- v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

1.c For all coatings and cleanup materials employed:

- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
- ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

2. The permittee shall collect and record the following information each day for this emissions unit :

- a. the company identification of each coating and/or cleanup material employed; and
- b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV cure hardcoat coating operation for plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	37.5 pounds OC/hr (see A.I.2.a).

2. Additional Terms and Conditions

- 2.a The 37.5 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

1. The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coatings employed.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: DECO up-spray (R038)
Activity Description: DECO spray booth #3

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>
DECO coating operation #3 for plastic parts	OAC rule 3745-21-07(G)(2)	8.0 pounds/hr and 40 pounds/day of organic compounds (OC)
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	See section A.II.1.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.b of the terms and conditions of this permit.
		None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any 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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

1.a For all coatings employed:

- i. the company identification of each coating employed;
- ii. the quantity of each coating employed, in gallons;
- iii. the OC content of each coating employed, in pounds/gallon;
- iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
- v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

1.b For all cleanup materials employed :

- i. the company identification of each cleanup material* employed;
- ii. the quantity of each cleanup material employed, in gallons;
- iii. the OC content of each cleanup material employed, in pounds/gallon;
- iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
- v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

1.c For all coatings and cleanup materials employed:

- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
- ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

2. The permittee shall collect and record the following information each day for this emissions unit :

- a. the company identification of each coating and/or cleanup material employed;
- b. the determination of whether or not each cleanup material is a photochemically reactive material;
- c. the quantity of each coating employed, in gallons;
- d. the OC content of each coating employed, in pounds/gallon, as applied*;
- e. the OC emission rate for each coating employed, in pounds [c X d];
- f. the total OC emission rate for all coatings employed, in pounds [summation of e for all coatings];
- g. the total number of hours the emissions unit was in operation; and
- h. the average hourly OC emission rate for all coatings, in pounds/hour (daily average) [f/g].

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
2. The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.
 - 1.b Emission Limitation:
8.0 pounds/hour OC
40.0 pounds/day OC

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.2. of the terms and conditions of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

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>
DECO coating operation # 3 for plastic parts	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: UV Clearcoat (R050)

Activity Description: UV Clearcoat/Hardcoat spray booth system #2 for plastic parts

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>
UV clear coat/hard coat spray booth system # 2 for for plastic parts	OAC rule 3745-21-07(G)	None, refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a** The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b** The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c** 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.

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

- 1.a** For all coatings employed:
- i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

- 1.b** For all cleanup materials employed :
- i. the company identification of each cleanup material* employed;
 - ii. the quantity of each cleanup material employed, in gallons;
 - iii. the OC content of each cleanup material employed, in pounds/gallon;
 - iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
 - v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

- 1.c** For all coatings and cleanup materials employed:
- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
 - ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

- 2.** The permittee shall collect and record the following information each day for this emissions unit :
- a. the company identification of each coating and/or cleanup material employed; and
 - b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV clear coat/hard coat spray booth system # 2 for for plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	37.5 pounds OC/hr (see A.I.2.a).

2. Additional Terms and Conditions

- 2.a The 37.5 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

1. The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coatings employed.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: UV Clearcoat (R051)

Activity Description: UV Clearcoat/Hardcoat spray booth system #3 for plastic parts

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>
UV clear coat/hard coat spray booth system # 3 for for plastic parts	OAC rule 3745-21-07(G)	None, refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

- 1.a** For all coatings employed:
- i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

- 1.b** For all cleanup materials employed :
- i. the company identification of each cleanup material* employed;
 - ii. the quantity of each cleanup material employed, in gallons;
 - iii. the OC content of each cleanup material employed, in pounds/gallon;
 - iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
 - v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

- 1.c** For all coatings and cleanup materials employed:
- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
 - ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

- 2.** The permittee shall collect and record the following information each day for this emissions unit :
- a. the company identification of each coating and/or cleanup material employed; and
 - b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV clear coat/hard coat spray booth system # 3 for for plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	37.5 pounds OC/hr (see A.I.2.a).

2. Additional Terms and Conditions

- 2.a The 37.5 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

1. The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coatings employed.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Basecoat spray (R052)

Activity Description: DN-101 Second surface decorating: Basecoat spray booth for plastic parts

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>
DN-101 second surface decorating: basecoat spray booth for plastic parts	OAC rule 3745-21-07(G)	None, refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

- 1.a** For all coatings employed:
- i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

- 1.b** For all cleanup materials employed :
- i. the company identification of each cleanup material* employed;
 - ii. the quantity of each cleanup material employed, in gallons;
 - iii. the OC content of each cleanup material employed, in pounds/gallon;
 - iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
 - v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

- 1.c** For all coatings and cleanup materials employed:
- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
 - ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

- 2.** The permittee shall collect and record the following information each day for this emissions unit :
- a. the company identification of each coating and/or cleanup material employed; and
 - b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

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>
DN-101 second surface decorating: basecoat spray booth for plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	30 pounds OC/hr (see A.1.2.a). 0.13 pound particulate emissions (PE)/hr

2. Additional Terms and Conditions

- The 30 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

- The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.
- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "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 and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: propylene glycol monomethyl ether*

TLV (ug/m3): 369,000

Maximum Hourly Emission Rate (lbs/hr): 30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 988.1

MAGLC (ug/m3): 8,786

*It was conservatively assumed that, for this emissions unit, the compound in the coating materials with the lowest TLV was assumed to be the only air toxic emitted and it was emitted at the maximum hourly emission rate (i.e., the emission rate was not broken down into individual constituent proportions based on the coating formulation data).

II. Operational Restrictions (continued)

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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

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: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coatings employed.

V. Testing Requirements (continued)

1.b Emission Limitation -
0.13 lb/hour PE

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1 - TE) \times (1 - CE)$$

E = particulate matter emission rate (lbs/hour)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above PE emission limitation in accordance with OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Topcoat spray (R053)

Activity Description: DN-101 Second surface decorating: Topcoat spray booth for plastic parts

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>
DN-101 second surface decorating: topcoat spray booth for plastic parts	OAC rule 3745-21-07(G)	None, refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-31-05 (PTI No. 03-9956)	Refer to section A.I.2.a of the terms and conditions of this permit.
	OAC rule 3745-17-11(B)	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	None, refer to section A.I.2.c of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .
- 2.b The uncontrolled mass rate of particulate emissions 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 Erie County, which is identified as a P-3 county.
- 2.c 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.

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:

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

- 1.a** For all coatings employed:
- i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

- 1.b** For all cleanup materials employed :
- i. the company identification of each cleanup material* employed;
 - ii. the quantity of each cleanup material employed, in gallons;
 - iii. the OC content of each cleanup material employed, in pounds/gallon;
 - iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
 - v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

- 1.c** For all coatings and cleanup materials employed:
- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
 - ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

- 2.** The permittee shall collect and record the following information each day for this emissions unit :
- a. the company identification of each coating and/or cleanup material employed; and
 - b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

*Note: The coating information must be for the coating materials, as applied, including any thinning solvents added to the coatings at the facility.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.
- 3.** The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

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>
DN-101 second surface decorating: topcoat spray booth for plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	30 pounds OC/hr (see A.1.2.a). 0.52 pounds particulate emissions (PE)/hr

2. Additional Terms and Conditions

- The 30 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

- The permittee shall not place any part coated in this emissions unit in an oven in which the coating, or solvent vapor from the coating, comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen. The determination of whether or not the coating is baked, heat-cured, or heat-polymerized is based on whether the coating will redissolve in the original solvent mixture. Note: This restriction does not pertain to infrared cure ovens, ultraviolet cure ovens, or thermal cure ovens in which the part is cured in an atmosphere other than oxygen.
- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "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 and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 988.1

MAGLC (ug/m3): 4,476

II. Operational Restrictions (continued)

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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

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: 30 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coatings employed.

V. Testing Requirements (continued)

1.b Emission Limitation -
0.52 lb/hour PE

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1 - TE) \times (1 - CE)$$

E = particulate matter emission rate (lbs/hour)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above PE emission limitation in accordance with OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Flowcoater (R054)
Activity Description: Thermal cure flowcoater to clearcoat plastic parts

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>
thermal cure flowcoater to clearcoat plastic parts	OAC rule 3745-21-07(G) OAC rule 3745-31-05 (PTI No. 03-9956)	None, refer to section A.II.1 of the terms and conditions of this permit. Refer to section A.I.2.a of the terms and conditions of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053, P054 and P056 combined shall not exceed 235.6 tons/year, based upon a rolling, 365-day summation of the daily OC emissions .

II. Operational Restrictions

1. The permittee shall not employ any coating and/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 the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054 combined:
 - 1.a For all coatings employed:
 - i. the company identification of each coating employed;
 - ii. the quantity of each coating employed, in gallons;
 - iii. the OC content of each coating employed, in pounds/gallon;
 - iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and
 - v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

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

1.b For all cleanup materials employed :

- i. the company identification of each cleanup material* employed;
- ii. the quantity of each cleanup material employed, in gallons;
- iii. the OC content of each cleanup material employed, in pounds/gallon;
- iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and
- v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

*Note: The permittee is only required to maintain records for cleanup materials which result in the emissions of OC.

1.c For all coatings and cleanup materials employed:

- i. the total OC emissions for all coatings and cleanup materials employed, in pounds [sum of 1.a.v and 1.b.v]; and
- ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

OC emissions/rolling, 365-day period = sum of 1.c.i for the preceding 364 calendar days and 1.c.i for the current day.

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

- a. The company identification for each coating and/or cleanup material employed and the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.
- b. The number of gallons of each coating employed.
- c. The organic compound content of each coating, in pounds per gallon.
- d. The total potential (prior to applying the booth/oven "split") organic compound emission rate for all coatings, in pounds.

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

3. For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P056), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon calculations provided by the company that incorporated information from the coating supplier. The "split" of organic compound emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight%).

IV. Reporting Requirements

- 1.** The permittee shall submit deviation (excursion) reports which identify each day during which the rolling, 365-day summation of the daily OC emissions did not comply with the allowable of 235.6 tons OC/year.
- 2.** The permittee shall submit quarterly deviation (excursion) reports which identify each day during which a noncomplying (i.e., photochemically reactive) coating or cleanup material was employed in this emissions unit, as well as the corrective action(s) taken to achieve compliance.

IV. Reporting Requirements (continued)

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.

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: 235.6 tons OC/year, based upon a rolling, 365-day summation

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
thermal cure flowcoater to clearcoat plastic parts	OAC rule 3745-31-05 PTI No. 03-9956	39 pounds OC/hr (see A.1.2.a.)

2. Additional Terms and Conditions

- 2.a The 39 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "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 and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: diacetone alcohol*

TLV (ug/m3): 238,000

Maximum Hourly Emission Rate (lbs/hr): 39

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1720

MAGLC (ug/m3): 5,667

*It was conservatively assumed that, for this emissions unit P056, the compound in the coating materials with the lowest TLV was assumed to be the only air toxic emitted and it was emitted at the maximum hourly emission rate (i.e., the emission rate was not broken down into individual constituent proportions based on the coating formulation data).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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

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: 39 pounds OC/hr

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation by multiplying the maximum hourly coating usage by the maximum OC content of all coating materials employed.

Facility Name: **Ford Motor Company - Sandusky Plastics Plant**
Facility ID: **03-22-02-0042**
Emissions Unit: **Flowcoater (R054)**

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT
