



State of Ohio Environmental Protection Agency

Street Address:

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

09/30/99

**CERTIFIED MAIL**

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

01-25-03-1840  
TS TRIM INDUSTRIES, INC.  
John H. Moorman  
59 Gender Road  
Canal Winchester, OH 43110-9635

Dear John H. Moorman:

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 Central 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 Central District Office.**

Very truly yours,

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

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



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Issue Date: 09/30/99

### DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

TS TRIM INDUSTRIES, INC.  
59 Gender Road  
Canal Winchester, OH 43110-9640

of a Title V permit for Facility ID: 01-25-03-1840

Emissions Unit ID (Company ID)/  
Emissions Unit Activity Description:  
R019 (AV-1 ACCORD VAC)  
AV-1 ACCORD VAC

R020 (AF-1 ACCORD FAB)  
AF-1 ACCORD FAB

R021 (AF-2 ACCORD FAB)  
AF-2 ACCORD FAB

R024 (CC-1 CIVIC CENT)  
CC-1 CIVIC CENT

R025 (AF-3 ACURA 2-D)  
AF-3 ACCORD 2-D

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:

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

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

## **A. State and Federally Enforceable Section**

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

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

to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

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

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

## **3. Risk Management Plans**

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

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

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

### **4. Permit Transfers**

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

### **5. Air Pollution Nuisance**

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

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

**None**

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

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

P007 - Glue Room(GR-1); and  
R028 - SPCC Kime Komi spray booth w/electric oven.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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

**Emissions Unit ID:** AV-1 ACCORD VAC (R019)  
**Activity Description:** AV-1 ACCORD VAC

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AV-1) with 2 flash-off ovens and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-21-07(G)(1)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 01-6663	The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions. See A.I.2.a, A.I.2.b and A.II.1 below.

##### 2. Additional Terms and Conditions

- 2.a** The 38.4 lbs of OC/hr limitation, excluding cleanup emissions, for emissions units R019, R020, R021, R024 and R025 was established for permit to install purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this specific limitation.
- 2.b** The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.
- 2.c** The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The permittee shall not employ more than 12,000 gallons/month of adhesives in this emissions unit, and the OC content of the adhesives shall not exceed 5.6 lbs/gallon. The permittee shall not employ more than 55 gallons/month of cleanup materials in this emissions unit, and the OC content of the cleanup materials shall not exceed 6.7 lbs/gallon.
2. The PTE shall be maintained under negative pressure at a minimum differential pressure and solvent laden fan speed of not less than the following at all times when the emissions unit is in operation:
  - a. 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; and
  - b. 725 shaft revolutions per minute.
3. The nonmethane organic compound (NMOC) concentration of the exhaust gases from the carbon bed concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below. The permittee shall also maintain and operate a monitoring device and a recorder which measures and records the shaft revolutions for the solvent laden air fan.

The differential pressure monitors and recorder(s) will serve as the primary instrumentation for ensuring the integrity of the PTE. The solvent laden air fan speed shall serve as the secondary instrumentation, if the primary instrumentation is inoperable. The primary and secondary instrumentation shall be maintained in accordance with the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan (Revision 7). In accordance with the QA/QC plan, the differential pressure gauges shall be calibrated on a monthly basis to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer semi-annually during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring devices and recorder(s) which measure and record the nonmethane organic compound (NMOC) emissions in parts per million (ppm) from the carbon bed concentrator in accordance with the procedures specified in the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be manually calibrated on a weekly basis with a certified span gas at nominal concentration of 10 ppm isobutylene. The secondary NMOC monitor shall be calibrated prior to its use, with the same certified calibration gas used for the primary NMOC monitor.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period;
  - b. the shaft revolutions of the solvent laden air fan, in revolutions per minute;
  - c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each adhesive and cleanup material employed in emissions units R019, R020, R021, R024, and R025;
  - b. the OC content, in pounds per gallon, of each adhesive and cleanup material, as employed;
  - c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020, R021, R024, and R025;
  - d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020, R021, R024, and R025;
  - e. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - f. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

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

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the monthly adhesive and cleanup material usage restrictions;
  - b. any exceedance of the OC content restrictions for the adhesives and cleanup materials;
  - c. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - d. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - e. all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - g. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.

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

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

The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

Applicable Compliance Method:  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

    - i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021, R024, and R025 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

### **1.b Emission Limitation:**

The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.

#### **Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AV-1) with 2 flash-off ovens and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-31-05 PTI 01-6663	See B.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The total controlled emission rate from emissions units R019, R020, R021, R024 and R025 shall not exceed 77 tons of OC/year, including cleanup emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain monthly records of the following information for emissions units R019, R020, R021, R024, and R025:
  - a. the total uncontrolled OC emission rate for all adhesives and cleanup materials, in pounds per month ( i.e., the summation of (A.III.5.b) x (A.III.5.c), for each adhesive and cleanup material); and
  - b. the total controlled OC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from a. above multiplied by the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).

**IV. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total OC emissions from emissions units R019, R020, R021, R024, and R025 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total controlled emission rate from R019, R020, R021, R024, and R025 shall not exceed 77 tons of OC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual OC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section B.III.1 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section A.V.1.a of this permit.

## VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation 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: acetone (44%), methyl ethyl ketone (21%), toluene (10.1%), n-hexane (22%)

TLV (mg/m<sup>3</sup>): acetone-1,780 mg/m<sup>3</sup>, methyl ethyl ketone -590 mg/m<sup>3</sup>, toluene-188 mg/m<sup>3</sup>, n-hexane-176 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 39.3 lb/hr (12/19/92 model)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 203.2 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 42,380 ug/m<sup>3</sup> (acetone), 14,047 ug/m<sup>3</sup> (methyl ethyl ketone), 4,476 ug/m<sup>3</sup> (toluene), 4,190 ug/m<sup>3</sup>

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.

**VI. Miscellaneous Requirements (continued)**

4. The permittee shall maintain the approved quality assurance/quality control plan for the differential pressure and NMOC continuous monitoring systems and the logbook dedicated to the continuous NMOC continuous monitoring system on site and available for inspection during regular office hours. The permittee shall submit proposed revisions to the quality assurance/quality control plan in writing to the Ohio EPA, Central District Office for approval prior to implementing any revisions.

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

**Emissions Unit ID:** AF-1 ACCORD FAB (R020)  
**Activity Description:** AF-1 ACCORD FAB

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-1) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-21-07(G)(1)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 01-6663	The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions. See A.I.2.a, A.I.2.b and A.II.1 below.

**2. Additional Terms and Conditions**

- 2.a** The 38.4 lbs of OC/hr limitation, excluding cleanup emissions, for emissions units R019, R020, R021, R024 and R025 was established for permit to install purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this specific limitation.
- 2.b** The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.
- 2.c** The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The permittee shall not employ more than 9,358 gallons/month of adhesives in emissions units R020, R021, R024, and R025, and the OC content of the adhesives shall not exceed 5.95 lb/gallon. The permittee shall not employ more than 165 gallons/month of cleanup materials in emissions unit R020, R021, R024, and R025, and the OC content of the cleanup materials shall not exceed 6.7 lb/gallon.
2. The PTE shall be maintained under negative pressure at a minimum differential pressure and solvent laden fan speed of not less than the following at all times when the emissions unit is in operation:
  - a. 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; and
  - b. 725 shaft revolutions per minute.
3. The nonmethane organic compound (NMOC) concentration of the exhaust gases from the carbon bed concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below. The permittee shall also maintain and operate a monitoring device and a recorder which measures and records the shaft revolutions for the solvent laden air fan.

The differential pressure monitors and recorder(s) will serve as the primary instrumentation for ensuring the integrity of the PTE. The solvent laden air fan speed shall serve as the secondary instrumentation, if the primary instrumentation is inoperable. The primary and secondary instrumentation shall be maintained in accordance with the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan (Revision 7). In accordance with the QA/QC plan, the differential pressure gauges shall be calibrated on a monthly basis to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer semi-annually during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring devices and recorder(s) which measure and record the nonmethane organic compound (NMOC) emissions in parts per million (ppm) from the carbon bed concentrator in accordance with the procedures specified in the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be manually calibrated on a weekly basis with a certified span gas at nominal concentration of 10 ppm isobutylene. The secondary NMOC monitor shall be calibrated prior to its use, with the same certified calibration gas used for the primary NMOC monitor.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period;
  - b. the shaft revolutions of the solvent laden air fan, in revolutions per minute;
  - c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each adhesive and cleanup material employed in emissions units R019, R020, R021, R024, and R025;
  - b. the OC content, in pounds per gallon, of each adhesive and cleanup material, as employed;
  - c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020, R021, R024, and R025;
  - d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020, R021, R024, and R025;
  - e. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - f. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

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

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the monthly adhesive and cleanup material usage restrictions;
  - b. any exceedance of the OC content restrictions for the adhesives and cleanup materials;
  - c. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - d. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - e. all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - g. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.

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

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

The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

Applicable Compliance Method:  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

    - i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021, R024, and R025 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

### **1.b Emission Limitation:**

The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.

#### **Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-1) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-31-05 PTI 01-6663	See B.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The total controlled emission rate from emissions units R019, R020, R021, R024 and R025 shall not exceed 77 tons of OC/year, including cleanup emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain monthly records of the following information for emissions units R019, R020, R021, R024, and R025:
  - a. the total uncontrolled OC emission rate for all adhesives and cleanup materials, in pounds per month ( i.e., the summation of (A.III.5.b) x (A.III.5.c), for each adhesive and cleanup material); and
  - b. the total controlled OC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from a. above multiplied by the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).

**IV. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total OC emissions from emissions units R019, R020, R021, R024, and R025 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total controlled emission rate from R019, R020, R021, R024, and R025 shall not exceed 77 tons of OC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual OC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section B.III.1 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section A.V.1.a of this permit.

## VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation 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: acetone (44%), methyl ethyl ketone (21%), toluene (10.1%), n-hexane (22%)

TLV (mg/m<sup>3</sup>): acetone-1,780 mg/m<sup>3</sup>, methyl ethyl ketone -590 mg/m<sup>3</sup>, toluene-188 mg/m<sup>3</sup>, n-hexane-176 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 39.3 lb/hr (12/19/92 model)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 203.2 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 42,380 ug/m<sup>3</sup> (acetone), 14,047 ug/m<sup>3</sup> (methyl ethyl ketone), 4,476 ug/m<sup>3</sup> (toluene), 4,190 ug/m<sup>3</sup>

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.

**VI. Miscellaneous Requirements (continued)**

4. The permittee shall maintain the approved quality assurance/quality control plan for the differential pressure and NMOC continuous monitoring systems and the logbook dedicated to the continuous NMOC continuous monitoring system on site and available for inspection during regular office hours. The permittee shall submit proposed revisions to the quality assurance/quality control plan in writing to the Ohio EPA, Central District Office for approval prior to implementing any revisions.

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

**Emissions Unit ID:** AF-2 ACCORD FAB (R021)  
**Activity Description:** AF-2 ACCORD FAB

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-2) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-21-07(G)(1)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 01-6663	The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions. See A.I.2.a, A.I.2.b and A.II.1 below.

##### 2. Additional Terms and Conditions

- 2.a** The 38.4 lbs of OC/hr limitation, excluding cleanup emissions, for emissions units R019, R020, R021, R024 and R025 was established for permit to install purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this specific limitation.
- 2.b** The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.
- 2.c** The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The permittee shall not employ more than 9,358 gallons/month of adhesives in emissions units R020, R021, R024, and R025, and the OC content of the adhesives shall not exceed 5.95 lb/gallon. The permittee shall not employ more than 165 gallons/month of cleanup materials in emissions unit R020, R021, R024, and R025, and the OC content of the cleanup materials shall not exceed 6.7 lb/gallon.
2. The PTE shall be maintained under negative pressure at a minimum differential pressure and solvent laden fan speed of not less than the following at all times when the emissions unit is in operation:
  - a. 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; and
  - b. 725 shaft revolutions per minute.
3. The nonmethane organic compound (NMOC) concentration of the exhaust gases from the carbon bed concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below. The permittee shall also maintain and operate a monitoring device and a recorder which measures and records the shaft revolutions for the solvent laden air fan.

The differential pressure monitors and recorder(s) will serve as the primary instrumentation for ensuring the integrity of the PTE. The solvent laden air fan speed shall serve as the secondary instrumentation, if the primary instrumentation is inoperable. The primary and secondary instrumentation shall be maintained in accordance with the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan (Revision 7). In accordance with the QA/QC plan, the differential pressure gauges shall be calibrated on a monthly basis to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer semi-annually during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring devices and recorder(s) which measure and record the nonmethane organic compound (NMOC) emissions in parts per million (ppm) from the carbon bed concentrator in accordance with the procedures specified in the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be manually calibrated on a weekly basis with a certified span gas at nominal concentration of 10 ppm isobutylene. The secondary NMOC monitor shall be calibrated prior to its use, with the same certified calibration gas used for the primary NMOC monitor.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period;
  - b. the shaft revolutions of the solvent laden air fan, in revolutions per minute;
  - c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each adhesive and cleanup material employed in emissions units R019, R020, R021, R024, and R025;
  - b. the OC content, in pounds per gallon, of each adhesive and cleanup material, as employed;
  - c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020, R021, R024, and R025;
  - d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020, R021, R024, and R025;
  - e. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - f. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

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

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the monthly adhesive and cleanup material usage restrictions;
  - b. any exceedance of the OC content restrictions for the adhesives and cleanup materials;
  - c. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - d. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - e. all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - g. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.

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

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

The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

Applicable Compliance Method:  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

    - i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021, R024, and R025 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

### **1.b Emission Limitation:**

The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.

#### **Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

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

## **VI. Miscellaneous Requirements**

**None**

## B. State Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-2) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-31-05 PTI 01-6663	See B.I.2.a below.

### 2. Additional Terms and Conditions

- 2.a The total controlled emission rate from emissions units R019, R020, R021, R024 and R025 shall not exceed 77 tons of OC/year, including cleanup emissions.

### II. Operational Restrictions

None

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

1. The permittee shall maintain monthly records of the following information for emissions units R019, R020, R021, R024, and R025:
  - a. the total uncontrolled OC emission rate for all adhesives and cleanup materials, in pounds per month ( i.e., the summation of (A.III.5.b) x (A.III.5.c), for each adhesive and cleanup material); and
  - b. the total controlled OC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from a. above multiplied by the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).

### IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total OC emissions from emissions units R019, R020, R021, R024, and R025 for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total controlled emission rate from R019, R020, R021, R024, and R025 shall not exceed 77 tons of OC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual OC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section B.III.1 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section A.V.1.a of this permit.

## VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation 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: acetone (44%), methyl ethyl ketone (21%), toluene (10.1%), n-hexane (22%)

TLV (mg/m<sup>3</sup>): acetone-1,780 mg/m<sup>3</sup>, methyl ethyl ketone -590 mg/m<sup>3</sup>, toluene-188 mg/m<sup>3</sup>, n-hexane-176 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 39.3 lb/hr (12/19/92 model)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 203.2 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 42,380 ug/m<sup>3</sup> (acetone), 14,047 ug/m<sup>3</sup> (methyl ethyl ketone), 4,476 ug/m<sup>3</sup> (toluene), 4,190 ug/m<sup>3</sup>

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.

**VI. Miscellaneous Requirements (continued)**

4. The permittee shall maintain the approved quality assurance/quality control plan for the differential pressure and NMOC continuous monitoring systems and the logbook dedicated to the continuous NMOC continuous monitoring system on site and available for inspection during regular office hours. The permittee shall submit proposed revisions to the quality assurance/quality control plan in writing to the Ohio EPA, Central District Office for approval prior to implementing any revisions.

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

**Emissions Unit ID:** CC-1 CIVIC CENT (R024)  
**Activity Description:** CC-1 CIVIC CENT

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (CC-1) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-21-07(G)(1)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 01-6663	The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions. See A.I.2.a, A.I.2.b and A.II.1 below.

##### 2. Additional Terms and Conditions

- 2.a** The 38.4 lbs of OC/hr limitation, excluding cleanup emissions, for emissions units R019, R020, R021, R024 and R025 was established for permit to install purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this specific limitation.
- 2.b** The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.
- 2.c** The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The permittee shall not employ more than 9,358 gallons/month of adhesives in emissions units R020, R021, R024, and R025, and the OC content of the adhesives shall not exceed 5.95 lb/gallon. The permittee shall not employ more than 165 gallons/month of cleanup materials in emissions unit R020, R021, R024, and R025, and the OC content of the cleanup materials shall not exceed 6.7 lb/gallon.
2. The PTE shall be maintained under negative pressure at a minimum differential pressure and solvent laden fan speed of not less than the following at all times when the emissions unit is in operation:
  - a. 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; and
  - b. 725 shaft revolutions per minute.
3. The nonmethane organic compound (NMOC) concentration of the exhaust gases from the carbon bed concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below. The permittee shall also maintain and operate a monitoring device and a recorder which measures and records the shaft revolutions for the solvent laden air fan.

The differential pressure monitors and recorder(s) will serve as the primary instrumentation for ensuring the integrity of the PTE. The solvent laden air fan speed shall serve as the secondary instrumentation, if the primary instrumentation is inoperable. The primary and secondary instrumentation shall be maintained in accordance with the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan (Revision 7). In accordance with the QA/QC plan, the differential pressure gauges shall be calibrated on a monthly basis to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer semi-annually during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring devices and recorder(s) which measure and record the nonmethane organic compound (NMOC) emissions in parts per million (ppm) from the carbon bed concentrator in accordance with the procedures specified in the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be manually calibrated on a weekly basis with a certified span gas at nominal concentration of 10 ppm isobutylene. The secondary NMOC monitor shall be calibrated prior to its use, with the same certified calibration gas used for the primary NMOC monitor.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period;
  - b. the shaft revolutions of the solvent laden air fan, in revolutions per minute;
  - c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each adhesive and cleanup material employed in emissions units R019, R020, R021, R024, and R025;
  - b. the OC content, in pounds per gallon, of each adhesive and cleanup material, as employed;
  - c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020, R021, R024, and R025;
  - d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020, R021, R024, and R025;
  - e. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - f. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

#### IV. Reporting Requirements

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the monthly adhesive and cleanup material usage restrictions;
  - b. any exceedance of the OC content restrictions for the adhesives and cleanup materials;
  - c. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - d. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - e. all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - g. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.

#### V. Testing Requirements

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

The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

Applicable Compliance Method:  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

    - i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021, R024, and R025 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

### **1.b Emission Limitation:**

The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.

#### **Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (CC-1) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-31-05 PTI 01-6663	See B.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The total controlled emission rate from emissions units R019, R020, R021, R024 and R025 shall not exceed 77 tons of OC/year, including cleanup emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain monthly records of the following information for emissions units R019, R020, R021, R024, and R025:
  - a. the total uncontrolled OC emission rate for all adhesives and cleanup materials, in pounds per month ( i.e., the summation of (A.III.5.b) x (A.III.5.c), for each adhesive and cleanup material); and
  - b. the total controlled OC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from a. above multiplied by the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).

**IV. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total OC emissions from emissions units R019, R020, R021, R024, and R025 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total controlled emission rate from R019, R020, R021, R024, and R025 shall not exceed 77 tons of OC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual OC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section B.III.1 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section A.V.1.a of this permit.

## VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation 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: acetone (44%), methyl ethyl ketone (21%), toluene (10.1%), n-hexane (22%)

TLV (mg/m<sup>3</sup>): acetone-1,780 mg/m<sup>3</sup>, methyl ethyl ketone -590 mg/m<sup>3</sup>, toluene-188 mg/m<sup>3</sup>, n-hexane-176 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 39.3 lb/hr (12/19/92 model)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 203.2 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 42,380 ug/m<sup>3</sup> (acetone), 14,047 ug/m<sup>3</sup> (methyl ethyl ketone), 4,476 ug/m<sup>3</sup> (toluene), 4,190 ug/m<sup>3</sup>

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.

**VI. Miscellaneous Requirements (continued)**

4. The permittee shall maintain the approved quality assurance/quality control plan for the differential pressure and NMOC continuous monitoring systems and the logbook dedicated to the continuous NMOC continuous monitoring system on site and available for inspection during regular office hours. The permittee shall submit proposed revisions to the quality assurance/quality control plan in writing to the Ohio EPA, Central District Office for approval prior to implementing any revisions.

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

**Emissions Unit ID:** AF-3 ACURA 2-D (R025)  
**Activity Description:** AF-3 ACCORD 2-D

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-3) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-21-07(G)(1)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitations specified in this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI 01-6663	The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions. See A.I.2.a, A.I.2.b and A.II.1 below.

**2. Additional Terms and Conditions**

- 2.a** The 38.4 lbs of OC/hr limitation, excluding cleanup emissions, for emissions units R019, R020, R021, R024 and R025 was established for permit to install purposes to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this specific limitation.
- 2.b** The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.
- 2.c** The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The permittee shall not employ more than 9,358 gallons/month of adhesives in emissions units R020, R021, R024, and R025, and the OC content of the adhesives shall not exceed 5.95 lb/gallon. The permittee shall not employ more than 165 gallons/month of cleanup materials in emissions unit R020, R021, R024, and R025, and the OC content of the cleanup materials shall not exceed 6.7 lb/gallon.
2. The PTE shall be maintained under negative pressure at a minimum differential pressure and solvent laden fan speed of not less than the following at all times when the emissions unit is in operation:
  - a. 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; and
  - b. 725 shaft revolutions per minute.
3. The nonmethane organic compound (NMOC) concentration of the exhaust gases from the carbon bed concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below. The permittee shall also maintain and operate a monitoring device and a recorder which measures and records the shaft revolutions for the solvent laden air fan.

The differential pressure monitors and recorder(s) will serve as the primary instrumentation for ensuring the integrity of the PTE. The solvent laden air fan speed shall serve as the secondary instrumentation, if the primary instrumentation is inoperable. The primary and secondary instrumentation shall be maintained in accordance with the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan (Revision 7). In accordance with the QA/QC plan, the differential pressure gauges shall be calibrated on a monthly basis to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer semi-annually during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring devices and recorder(s) which measure and record the nonmethane organic compound (NMOC) emissions in parts per million (ppm) from the carbon bed concentrator in accordance with the procedures specified in the May 9, 1997 Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be manually calibrated on a weekly basis with a certified span gas at nominal concentration of 10 ppm isobutylene. The secondary NMOC monitor shall be calibrated prior to its use, with the same certified calibration gas used for the primary NMOC monitor.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period;
  - b. the shaft revolutions of the solvent laden air fan, in revolutions per minute;
  - c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each adhesive and cleanup material employed in emissions units R019, R020, R021, R024, and R025;
  - b. the OC content, in pounds per gallon, of each adhesive and cleanup material, as employed;
  - c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020, R021, R024, and R025;
  - d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020, R021, R024, and R025;
  - e. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - f. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

#### IV. Reporting Requirements

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the monthly adhesive and cleanup material usage restrictions;
  - b. any exceedance of the OC content restrictions for the adhesives and cleanup materials;
  - c. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - d. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - e. all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute;
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - g. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.

#### V. Testing Requirements

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

The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

Applicable Compliance Method:  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

    - i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021, R024, and R025 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

### **1.b Emission Limitation:**

The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.

#### **Applicable Compliance Method:**

Compliance with this emissions limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Adhesive spray booth (AF-3) with flash-off oven and controlled with a permanent total enclosure (PTE) vented to carbon bed concentrator and thermal incinerator.	OAC rule 3745-31-05 PTI 01-6663	See B.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The total controlled emission rate from emissions units R019, R020, R021, R024 and R025 shall not exceed 77 tons of OC/year, including cleanup emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain monthly records of the following information for emissions units R019, R020, R021, R024, and R025:
  - a. the total uncontrolled OC emission rate for all adhesives and cleanup materials, in pounds per month ( i.e., the summation of (A.III.5.b) x (A.III.5.c), for each adhesive and cleanup material); and
  - b. the total controlled OC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from a. above multiplied by the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).

**IV. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total OC emissions from emissions units R019, R020, R021, R024, and R025 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I.2.a of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total controlled emission rate from R019, R020, R021, R024, and R025 shall not exceed 77 tons of OC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual OC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section B.III.1 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section A.V.1.a of this permit.

## VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation 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: acetone (44%), methyl ethyl ketone (21%), toluene (10.1%), n-hexane (22%)

TLV (mg/m<sup>3</sup>): acetone-1,780 mg/m<sup>3</sup>, methyl ethyl ketone -590 mg/m<sup>3</sup>, toluene-188 mg/m<sup>3</sup>, n-hexane-176 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 39.3 lb/hr (12/19/92 model)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 203.2 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 42,380 ug/m<sup>3</sup> (acetone), 14,047 ug/m<sup>3</sup> (methyl ethyl ketone), 4,476 ug/m<sup>3</sup> (toluene), 4,190 ug/m<sup>3</sup>

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.

**VI. Miscellaneous Requirements (continued)**

4. The permittee shall maintain the approved quality assurance/quality control plan for the differential pressure and NMOC continuous monitoring systems and the logbook dedicated to the continuous NMOC continuous monitoring system on site and available for inspection during regular office hours. The permittee shall submit proposed revisions to the quality assurance/quality control plan in writing to the Ohio EPA, Central District Office for approval prior to implementing any revisions.

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