



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

05/31/02

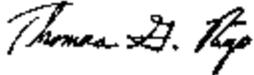
**RE: Proposed Title V Chapter 3745-77 Permit
06-30-00-0007
LDM Technologies**

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for LDM Technologies, has been created in Ohio EPA's State Air Resources System (STARS) on 05/31/02, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit 7+0 covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Southeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 05/31/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 06-30-00-0007 to:
 LDM Technologies
 110 N. 8th Street
 Byesville, OH 43723

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

P002 (Prime/Top Coat Oven) Curing of plastic coatings	Surface coating of plastic parts	Surface coating of plastic parts
P004 (Batch Oven) Curing of plastic coatings	R011 (Coating Spray Booth) Surface coating of plastic parts	R016 (Coating Spray Booth) Surface coating of plastic parts
P007 (Top Coat Oven) Curing of plastic coatings	R012 (Coating Spray Booth) Surface coating of plastic parts	R018 (Coating Spray Booth) Surface coating of plastic parts
R006 (Coating Spray Booth) Surface coating of plastic parts	R013 (Coating Spray Booth) Surface coating of plastic parts	R019 (Coating Spray Booth) Surface coating of plastic parts
R007 (Coating Spray Booth) Surface coating of plastic parts	R014 (Coating Spray Booth) Surface coating of plastic parts	R021 (Coating Spray Booth) Surface coating of plastic parts
R010 (Coating Spray Booth)	R015 (Coating Spray Booth)	

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

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

Southeast District Office
 2195 Front Street
 Logan, OH 43138
 (740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

 Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

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

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c. 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - 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 record keeping 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of 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.

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

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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, record keeping, 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.

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

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

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

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 condition, of any emissions unit(s) 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 upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

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.

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

4. Title IV Provisions

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

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

5. Severability Clause

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

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

7. Fees

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

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

8. Marketable Permit Programs

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

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

9. Reasonably Anticipated Operating Scenarios

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

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

10. Reopening for Cause

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

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

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

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.

- (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

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

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

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

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

16. Off-Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

18. Insignificant Activities

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

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

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

20. Air Pollution Nuisance

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

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (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.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with

paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

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

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

If no 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:

P003 - drying oven;
Z002 - paint mix room, line #4;
Z003 - paint mix room, line #1; and
Z004 - rack 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: Prime/Top Coat Oven (P002)

Activity Description: Curing of plastic coatings

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired, line bake ovens 1A and 1B	OAC rule 3745-31-05(A)(3) (PTI 06-2376)	2.73 tpy of organic compound (OC) emissions for each oven
	OAC rule 3745-21-07(G)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). OC emissions shall not exceed 3 lbs/hr and 15 lbs/day for each oven.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for each oven (1A and 1B):
 - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operations associated with the oven, i.e., the sum of the values from sections A.III.1.f for emissions units R006 and R012 (oven 1A) or R007 and R013 (oven 1B), multiplied by the maximum percentage of the emissions associated with the oven (as defined in sections A.V.2 and A.V.3 of this permit), in pounds per day;
 - b. the total number of hours the oven was in operation (this number should be the same as the number of hours the associated coating operations were in operation); and
 - c. the average hourly OC emission rate, i.e., (a)/(b), in pounds per hour (average) for the oven.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for each oven (1A and 1B):
 - a. an identification of each day during which the average hourly OC emissions exceeded 3 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions exceeded 15 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall also submit annual reports which specify the total OC emissions from each oven for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1.a Emission Limitations:

3 lbs/hr of OC and 15 lbs/day of OC for each oven

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1. If required, testing to demonstrate compliance with the hourly emission limitation shall be conducted in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A. No testing is specifically required by this permit.

1.b Emission Limitation:

2.73 tpy of OC for each oven

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily values specified in section A.III.1.a, and then dividing by 2000 lbs/ton.

2. For purposes of calculating the OC emission rate for oven 1A and the associated spray booths (R006 and R012), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for oven 1A. This "split" of OC emissions between oven 1A and the associated spray booths is based upon a mass balance study conducted by the facility.
3. For purposes of calculating the OC emission rate for oven 1B and the associated spray booths (R007 and R013), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for oven 1B. This "split" of OC emissions between oven 1B and the associated spray booths is based upon a mass balance study conducted by the facility.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Batch Oven (P004)
Activity Description: Curing of plastic coatings

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired, batch oven #3	OAC rule 3745-31-05(A)(3) (PTI 06-2376)	2.73 tpy of organic compound (OC) emissions The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1).
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the oven:
 - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily OC emission rate for all coatings employed in the coating operations associated with the oven, i.e., the sum of the values from sections A.III.1.f for emissions units R010 and R011, multiplied by the maximum percentage of the emissions associated with the oven (as defined in section A.V.2 of this permit), in pounds per day;
 - b. the total number of hours the oven was in operation (this number should be the same as the number of hours the associated coating operations were in operation); and
 - c. the average hourly OC emission rate, i.e., (a)/(b), in pounds per hour (average) for the oven.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions exceeded 3 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions exceeded 15 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1.a Emission Limitations:

3 lbs/hr of OC and 15 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1. If required, testing to demonstrate compliance with the hourly emission limitation shall be conducted in accordance with Method 25 or 25A of 40 CFR Part 60, Appendix A. No testing is specifically required by this permit.

1.b Emission Limitation:

2.73 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily values specified in section A.III.1.a, and then dividing by 2000 lbs/ton.

2. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booths (R010 and R011), the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 22% of the OC employed in the spray booths shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon a mass balance study conducted by the facility.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Top Coat Oven (P007)
Activity Description: Curing of plastic coatings

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired, batch oven #4-6 vented to the thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-2800)	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-21-07(G)(1)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- 2.b All OC emissions from this emissions unit shall be vented to the thermal oxidation system with a minimum 90% control efficiency.
- 2.c The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.2.a and A.II.2.c, whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

- 2.e** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.2.a and A.II.2.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the thermal oxidation system.
3. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording device 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.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - b. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

All OC emissions from this emissions unit shall be vented to the thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for OC.
 - c. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R006)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #1	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 5.8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 2.0 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 5.8 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

5.8 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1A) . This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

2.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R007)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #2	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 7.95 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 2.0 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 7.95 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

7.95 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1B). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

2.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R010)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #5	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 5.0 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8.0 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

8.0 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be the uncontrolled emissions for the oven associated with this emissions unit (P004). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

5.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R011)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 4.64 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 5.0 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 4.64 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

4.64 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be the uncontrolled emissions for the oven associated with this emissions unit (P004). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

5.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R012)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #7	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 9.86 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 11.67 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 9.86 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

9.86 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1A). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

11.67 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R013)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth #8	OAC rule 3745-31-05(A)(3) (PTI 06-4764)	Organic compound (OC) emissions shall not exceed 8.48 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit. Maximum annual emissions of OC, including cleanup materials, shall not exceed 11.67 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A), and 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total potential (prior to applying the booth/oven "split") daily OC emission rate for all coatings, in pounds per day;
 - g. the total potential daily OC emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in section A.V.1.c of this permit), in pounds per day;
 - h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
 - j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
 - k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
 - l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
 - m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
 - n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall maintain daily records that document any time periods when the the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day; and
 - c. for the days during which photochemically reactive materials were not employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8.48 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

8 lbs/hr of OC and 40 lbs/day of OC on any day in which photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.1.j and A.III.1.i.
 - 1.b Emission Limitation:

8.48 lbs/hr of OC on any day in which photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.n.
 - 1.c For purposes of calculating the OC emission rates for this emissions unit and the associated bake oven, the permittee shall utilize a value of 78% as the maximum percentage of the OC employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 22% of the OC employed in the spray booth shall be considered to be part of the uncontrolled emissions for the oven associated with this emissions unit (P002-1B). This "split" of OC emissions between this emissions unit and the associated spray booth is based upon a mass balance study conducted by the facility.

V. Testing Requirements (continued)

1.d Emission Limitation:

11.67 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1, i.e., the summation of the daily values for the total OC emission rate for all coatings and cleanup materials (with and without photochemically reactive materials), divided by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

1.f Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R014)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
prime booth 1 (spray booth #4-10)	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The permittee shall employ particulate removal equipment having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.

III. Monitoring and/or Record Keeping Requirements

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

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.b Emission Limitation:

1.43 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.f.

1.c Emission Limitation:

6.25 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.d, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.d Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.e Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

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

Facility Name: **LDM Technologies, Inc.**
Facility ID: **06-30-00-0007**
Emissions Unit: **Coating Spray Booth (R014)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R015)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
prime booth 2 (spray booth #4-11)	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 1.43 lbs/hr, including cleanup materials. Maximum annual OC emissions shall not exceed 6.25 tpy, including cleanup materials. Particulate emissions shall not exceed 2.41 tpy.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The permittee shall employ particulate removal equipment having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.

III. Monitoring and/or Record Keeping Requirements

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

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 1.43 lbs/hr, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.b Emission Limitation:

1.43 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.1.f.

1.c Emission Limitation:

6.25 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.d, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.d Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.e Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

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

Facility Name: **LDM Technologies, Inc.**
Facility ID: **06-30-00-0007**
Emissions Unit: **Coating Spray Booth (R015)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R016)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint booth 1 (spray booth #4-12) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 11.13 lbs/hr, including cleanup materials.
		Maximum annual OC emissions shall not exceed 48.75 tpy, including cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		See A.I.2.a and A.I.2.b below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- 2.b The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

2. Additional Terms and Conditions (continued)

- 2.c** The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- 2.e** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2.** The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 3.** The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

II. Operational Restrictions (continued)

4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel 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 monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.

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

4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 11.13 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.c Emission Limitation:

11.13 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.

1.d Emission Limitation:

48.75 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.e Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint booth 1 (spray booth #4-12) controlled with a Zeolite adsorption/thermal oxidation system		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R016) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R018)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint booth 2 (spray booth #4-14) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 5.57 lbs/hr, including cleanup materials.
		Maximum annual OC emissions shall not exceed 24.38 tpy, including cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		See A.I.2.a and A.I.2.b below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. Additional Terms and Conditions

- The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

2. Additional Terms and Conditions (continued)

- 2.c The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- 2.e The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

II. Operational Restrictions (continued)

4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel 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 monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.

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

4. The permittee shall collect and record the following information for each day for the coating operation:
- a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

5. The permittee shall collect and record the following information for each day for the control equipment:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 5.57 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.c Emission Limitation:

5.57 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.

1.d Emission Limitation:

24.38 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.e Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint booth 2 (spray booth #4-14) controlled with a Zeolite adsorption/thermal oxidation system		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R018) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R019)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth 2 (spray booth #4-15) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 10.24 lbs/hr, including cleanup materials.
		Maximum annual OC emissions shall not exceed 44.85 tpy, including cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		See A.I.2.a and A.I.2.b below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- 2.b The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

2. Additional Terms and Conditions (continued)

- 2.c** The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- 2.e** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2.** The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 3.** The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

II. Operational Restrictions (continued)

4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel 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 monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.

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

4. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the OC content of each coating and cleanup material, in pounds per gallon;
 - d. the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - e. the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

5. The permittee shall collect and record the following information for each day for the control equipment:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - d. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 10.24 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.c Emission Limitation:

10.24 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.

1.d Emission Limitation:

44.85 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.e Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth 2 (spray booth #4-15) controlled with a Zeolite adsorption/thermal oxidation system		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R019) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Spray Booth (R021)
Activity Description: Surface coating of plastic parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth 1 (spray booth #4-17) controlled with a Zeolite adsorption/thermal oxidation system	OAC rule 3745-31-05(A)(3) (PTI 06-6362)	Organic compound (OC) emissions shall not exceed 2.56 lbs/hr, including cleanup materials.
		Maximum annual OC emissions shall not exceed 11.21 tpy, including cleanup materials.
		Particulate emissions shall not exceed 2.41 tpy.
		See A.I.2.a and A.I.2.b below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.
	OAC rule 3745-21-07(G)(6)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** The permittee shall maintain a permanent total enclosure (PTE) to capture 100% of the OC's applied within the system.
- 2.b** The permittee shall employ a Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency for OC emissions.

2. Additional Terms and Conditions (continued)

- 2.c** The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M), with the exceptions provided in A.II.4.a and A.II.4.c, whenever the emissions unit is in operation.
- 2.e** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in section A.I.2.e to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2.** The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time when the emissions unit is in operation, shall be within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 3.** The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.

II. Operational Restrictions (continued)

4. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the Zeolite adsorption/thermal oxidation system. Due to the size of the associated spray booth, the relatively large parts that are painted, and the need to maintain an acceptable quality of the final product, sections A.II.4.a and A.II.4.c contain design criteria that differ from the requirements of 40 CFR Part 51, Appendix M, Method 204. However, the intent of Method 204 has been satisfied based upon the following design criteria that shall be met:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point, unless otherwise specified by the Administrator (when this is not feasible, total enclosure will be demonstrated through maintaining a minimum 50 fpm facial velocity of air into the NDO);
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the facial velocity (FV) of air through all the NDO's shall be at least 50 fpm;
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations for section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions must be captured and contained for discharge to the Zeolite adsorption/thermal oxidation system.
5. The permittee shall employ particulate removal equipment prior to the VOC concentrator having a design control efficiency for particulates greater than 99% during any operation of the emissions unit.
6. Cleanup solvents shall be captured and recycled to the greatest extent possible.
7. The permittee shall immediately cease operation of this emissions unit if the control equipment is not functioning properly.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer and the temperature of the desorption air stream prior to the VOC concentrator wheel 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 monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
3. On a daily basis, when the emissions unit is in operation, the permittee shall monitor the actual RPH for the rotor wheelhouse and maintain a record of the result.

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

4. The permittee shall collect and record the following information for each day for the coating operation:
- the company identification for each coating and cleanup material employed;
 - the number of gallons of each coating and cleanup material employed;
 - the OC content of each coating and cleanup material, in pounds per gallon;
 - the total uncontrolled OC emission rate for all coatings and cleanup materials, in pounds per day;
 - the total controlled OC emission rate for all coatings and cleanup materials, in pounds per day (i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance);
 - the total number of hours the emissions unit was in operation; and
 - the average hourly controlled OC emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

5. The permittee shall collect and record the following information for each day for the control equipment:
- all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, was not within +/- 10 degrees Fahrenheit of the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - all 3-hour blocks of time during which the average static pressure differential across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water; and
 - a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
6. The permittee shall maintain daily records that document any time periods when the particulate removal equipment was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, does not comply with the temperature limitation specified above;
 - b. all 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel, when the emissions unit was in operation, does not comply with the temperature limitation specified above; and
 - c. all 3-hour blocks of time during which the average pressure drop across the enclosure, when the emissions unit was in operation, was less than 0.007 inch of water.

The permittee shall also submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the number of revolutions per hour (RPH) of the rotor wheelhouse was not continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emission test that demonstrated compliance with the applicable OC emission limitations.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 2.56 lbs/hr, and the actual average hourly OC emissions for each such day.
4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the particulate removal equipment was not in service when the emissions unit was in operation.
6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

All OC emissions from this emissions unit shall be vented to the Zeolite adsorption/thermal oxidation system with a minimum 90% control efficiency.

Applicable Compliance Method:

Compliance shall be demonstrated based on the stack testing requirements specified in section A.V.2.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

V. Testing Requirements (continued)

1.c Emission Limitation:

2.56 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the record keeping requirements specified in section A.III.4.g.

1.d Emission Limitation:

11.21 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.e, and shall be the summation of the daily OC emission rates for the calendar year, divided by 2000 lbs/ton.

1.e Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

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

The hourly emission limitation can not be exceeded if particulate removal equipment having a design control efficiency for particulate matter greater than 99% is employed during all use of the emissions unit.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly particulate emission limitation of 0.551 lb/hr by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations and the mass emission limitation for OC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, Method 25 or Method 25A (if less than 50 ppm) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units P007, R016, R018, R019, and R021 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in "OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95"). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth 1 (spray booth #4-17) controlled with a Zeolite adsorption/thermal oxidation system		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R021) was evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl alcohol (n-butanol)
 TLV (ug/m3): 61,000
 Maximum Hourly Emission Rate (lbs/hr): 2.08*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.93
 MAGLC (ug/m3): 1,452

* This was modeled for emissions units R016, R018, R019, and R021, combined.

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

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

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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