



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

02/06/02

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

03-02-00-0166  
DTR Industries Incorporated  
Jonathan Zimmerman  
320 Snider Road  
Bluffton, OH 45817

Dear Jonathan Zimmerman:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 04/25/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

and

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

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

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

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 02/06/02

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-02-00-0166 to:
DTR Industries Incorporated
320 Snider Road
Bluffton, OH 45817

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units K001 through K035 and L001, detailing various surface coating and dipping operations for miscellaneous metal parts.

L003 (Metal Parts Washer #1 (K3-1)) Metal parts cold cleaning machine that uses a halogenated non-exempt solvent.	Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.
L004 (Metal Parts Washer #2 (K3-2)) Metal parts cold cleaning machine that uses a halogenated non-exempt solvent.	P049 (Glycol Dip Tank No.3 w/(1) Steam Cleaning System (B462)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P057 (Joint Assembly Machine No.1 (A55)[Rubber Hose Cleaning]) Cleaning Operation Using M & M Thinner
P037 (BB240 Banbury Mixer #1 (S17-1)) Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.	P050 (Glycol Dip Tank No.4 w/(1) Steam Cleaning System (B464)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P058 (Joint Assembly Machine No.2 (A56)[Rubber Hose Cleaning]) Cleaning Operation Using M & M Thinner
P043 (Hose Marking Machine #1 (H70)) Ink Printing Operation For EFI Rubber Hose Using Transfer Head Process.	P051 (Glycol Dip Tank No.5 w/(1) Steam Cleaning System (B486)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P059 (Submerged Assembling Machine (B552)) Glycol dip tank with (1) steam cleaning system.
P046 (Glycol Dip Tank No.1 w/(2) Steam Cleaning Systems(B309)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P052 (Glycol Dip Tank No.6 w/(1) Steam Cleaning System (B505)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P060 (Submerged Assembling Machine (B596)) Glycol dip tank with (1) steam cleaning system.
P047 (Glycol Dip Tank No.2 w/(2) Steam Cleaning Systems(B329)) Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.	P053 (Glycol Dip Tank No.7 w/(1) Steam Cleaning System (B507))	P061 (Joint Assembly Machine (A60)) MEK and Methanol blend is used as a cleaning and insertion agent for rubber hose and metal joint
P048 (Glycol Dip Tank w/ (1) Steam Cleaning System (B195))		P064 (Banbury Mixer #2 (S040)) Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.
		P065 (Roll Mill #2 (S047)) Rubber Milling Machine: Particulate Air Emission Sources controlled by a Baghouse.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

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

#### 1. **Monitoring and Related 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 Enforceable Section

None

### B. State Only Enforceable Section

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

8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler ( B001); 8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler (B002); 8.5 mmBtu/hr, Natural Gas/#2 Oil Boiler (B003); Rubber Compound Mixing Machine (P001); Twin Roll Rubber Mill with Butcher (P002); Hose Cutting & Marking Machinery (P004); Hose Cleaning & Buffing Machinery (P005); Metal Parts Assembly Machine (P006); 2.6 mmBtu/hr Natural Gas Fired Brazing Furnace #1(P008); Rubber/Plastic Extruder #1(P009); Rubber/Plastic Extruder #2 (P010); Shot Blasting Machine with Baghouse (P014); Hose Marking Machine (P027); Metal Surface Treatment Line #1 (P029); Two Roll Rubber Mixer (P038); Batch Off Machine (P039); 2.6 mmBtu/hr Natural Gas Fired Brazing Furnace #2 (P040); Metal Surface Treatment Line #2 (P041); Aluminum Surface Treatment Line (P042); Twin Wet Blast and Phosphating Line (P044); Rubber Injection Curing Machine - 3 liter (Z100); Rubber Injection Curing Machine - 3 liter (Z101); Rubber Injection Curing Machine - 0.3 liter (Z102); Rubber Injection Curing Machine - 0.4 liter (Z104); Rubber Injection Curing Machine - 0.4 liter (Z105); Rubber Injection Curing Machine - 0.4 liter (Z106); Rubber Injection Curing Machine - 2.2 liter (Z109); Rubber Injection Curing Machine - 2.2 liter (Z110); Rubber Injection Curing Machine - 2.2 liter (Z111); Rubber Injection Curing Machine - 2.2 liter (Z112); Rubber Injection Curing Machine - 3 liter (Z113); Rubber Injection Curing Machine - 3 liter (Z116); Rubber Injection Curing Machine - 3 liter (Z119); Rubber Injection Curing Machine - 3 liter (Z120); Rubber Injection Curing Machine - 3 liter (Z123);

Rubber Injection Curing Machine - 2.2 liter (Z124); Rubber Injection Curing Machine - 2.2 liter (Z125); Rubber Injection Curing Machine - 3 liter (Z126); Rubber Injection Curing Machine - 2.2 liter (Z128); Rubber Injection Curing Machine - 2.2 liter (Z129); Rubber Injection Curing Machine - 3 liter (Z130); Rubber Injection Curing Machine - 1 liter (Z131); Rubber Injection Curing Machine - 1 liter (Z132); Rubber Injection Curing Machine - 1 liter (Z133); Rubber Injection Curing Machine - 1 liter (Z135); Rubber Injection Curing Machine - 2 liter (Z136); Rubber Injection Curing Machine - 2 liter (Z137); Rubber Injection Curing Machine - 3 liter (Z138); Rubber Injection Curing Machine - 3 liter (Z139); Rubber Injection Curing Machine - 3 liter (Z140); Rubber Injection Curing Machine - 2 liter (Z141); Rubber Injection Curing Machine - 1 liter (Z149); Rubber Injection Curing Machine - 1 liter (Z150); Rubber Injection Curing Machine - 1 liter (Z151); Rubber Injection Curing Machine - 0.6 liter (Z155); Rubber Injection Curing Machine - 0.6 liter (Z156);

Rubber Injection Curing Machine - 0.6 liter (Z157); Rubber Injection Curing Machine - 0.5 liter (Z158); Rubber Injection Curing Machine - 0.6 liter (Z159); Rubber Injection Curing Machine - 0.6 liter (Z160); Rubber Injection Curing Machine - 2 liter (Z161); Rubber Injection Curing Machine - 3 liter (Z168); Rubber Hose Autoclave Curing No. 1 (Z200); Rubber Hose Autoclave Curing No. 2 (Z201); 60 mm diameter Rubber Extruder No. 1 (Z204); Adhesive Dispensing Units 1 & 2 (Z206); Hose Heating Oven No. 2 (Z208); Inner Cover Rubber Hose Extruder (Z212); Outer Cover Rubber Hose Extruder (Z213); Steam Oven for Curing Rubber Hose (Quality Assurance Lab) (Z214); Inner Cover Rubber Hose Extruder (Z215); Outer Cover Rubber Hose Extruder (Z216); Rubber Hose Extruder (Z217); Process Oil Tanks with Heating & Delivery Systems (Z226); CO2 Rotary Welder #1 (Z250); CO2 Rotary Welder #3 (Z252); Projection Welding Machine #1 (Z254); Projection Welding Machine #2 (Z255); Projection Welding Machine (Z257); Spot Welder (Z258); Strut Mount Inner Cutter No. 2 (Z302); Strut Mount Inner Cutter No. 3 (Z303); Pipe Cutting Machine No. 2 (Z304); Milling Machine (Z306); Pipe Cutting Machine No. 3 (Z307); Pipe Finishing Machine No. 3 (Z308); Pipe Cutting Machine No. 4 (Z309); Pipe Finishing Machine No. 4 (Z310); Inner Ring Slitter Machine No. 1 (Z311); Inner Ring Slitter Machine No. 2 (Z312); E/M Aluminum Cutting Machine No. 1 - Line 1 (Z313); E/M Projection Welding Machine (Z314); E/M Aluminum Cutting Machine No. 2 - Line 1 (Z315); E/M Aluminum Tapping Machine (Z316); M/M Aluminum Cutting Machine No. 1 Lathe - No. 2 Line (Z317);

**B. State Only Enforceable Section (continued)**

M/M Aluminum Cutting Machine No. 2 Lathe - No. 2 Line (Z318); M/M Aluminum Cutting Machine No. 1 Lathe - No. 3 Line (Z319); M/M Aluminum Cutting Machine No. 2 Lathe - No. 3 Line (Z320); Aluminum Cutting Machine No. 1 Lathe - No. 4 Line (Z321); Aluminum Cutting Machine No. 2 Lathe - No. 4 Line (Z322); Steel Cutting Machine (Z323); Pipe Cutting and Finish Machine No. 1 (Z324); CNC Precision Lathe No. 1-1 (Z350); CNC Precision Lathe No. 2-1 (Z351); CNC Precision Lathe No. 3-1 (Z352); CNC Precision Lathe No. 4-1 (Z353); CNC Precision Lathe No. 1-2 (Z354); CNC Precision Lathe No. 2-2 (Z355); CNC Precision Lathe No. 3-2 (Z356); CNC Precision Lathe No. 4-2 (Z357); CNC Precision Lathe No. 1-3 (Z358); CNC Precision Lathe No. 2-3 (Z359); CNC Precision Lathe No. 3-3 (Z360); CNC Precision Lathe No. 4-3 (Z361); CNC Precision Lathe No. 5-1 (Z362); CNC Precision Lathe No. 6-1 (Z363); CNC Precision Lathe No. 5-2 (Z364); CNC Precision Lathe No. 6-2 (Z365); CNC Precision Lathe No. 5-3 (Z366); CNC Precision Lathe No. 6-3 (Z367); CNC Precision Lathe No. 7 (Z368); CNC Precision Lathe No. 8 (Z369); and CNC Precision Lathe No. 9 (Z370).

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 (PTI) for the emissions unit.

M/M Aluminum Cutting Machine No. 2 Lathe - No. 2 Line (Z318); M/M Aluminum Cutting Machine No. 1 Lathe - No. 3 Line (Z319); M/M Aluminum Cutting Machine No. 2 Lathe - No. 3 Line (Z320); Aluminum Cutting Machine No. 1 Lathe - No. 4 Line (Z321); Aluminum Cutting Machine No. 2 Lathe - No. 4 Line (Z322); Steel Cutting Machine (Z323); Pipe Cutting and Finish Machine No. 1 (Z324); CNC Precision Lathe No. 1-1 (Z350); CNC Precision Lathe No. 2-1 (Z351); CNC Precision Lathe No. 3-1 (Z352); CNC Precision Lathe No. 4-1 (Z353); CNC Precision Lathe No. 1-2 (Z354); CNC Precision Lathe No. 2-2 (Z355); CNC Precision Lathe No. 3-2 (Z356); CNC Precision Lathe No. 4-2 (Z357); CNC Precision Lathe No. 1-3 (Z358); CNC Precision Lathe No. 2-3 (Z359); CNC Precision Lathe No. 3-3 (Z360); CNC Precision Lathe No. 4-3 (Z361); CNC Precision Lathe No. 5-1 (Z362); CNC Precision Lathe No. 6-1 (Z363); CNC Precision Lathe No. 5-2 (Z364); CNC Precision Lathe No. 6-2 (Z365); CNC Precision Lathe No. 5-3 (Z366); CNC Precision Lathe No. 6-3 (Z367); CNC Precision Lathe No. 7 (Z368); CNC Precision Lathe No. 8 (Z369); and CNC Precision Lathe No. 9 (Z370).

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 (PTI) for the emissions unit.

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

**Emissions Unit ID:** Adhesive Dipping & Metal Cleaning Machine (A1) (K001)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Electronic Fuel Injection Hose Using A VOC Non-Compliant Coating

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping & metal cleaning machine (A1)	OAC rule 3745-31-05(A)(3) (PTI #03-13454)	Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  65.3 lbs of organic compounds (OC)/day, 2.36 tons of OC/yr, including cleanup materials
	OAC rule 3745-21-09(U)(2)	See A.I.2.b.

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The usage restriction specified by this rule is less stringent than the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

None

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed;
  - c. the total volume, in gallons, of all the coatings and cleanup materials employed;
  - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - e. the OC emission rate for each coating and cleanup material, in pounds (b x d); and
  - f. the total OC emission rate for all the coatings and cleanup materials employed, in pounds (summation of e for all the coatings and cleanup materials).

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

2. The permittee shall collect and record each year the OC emissions for all the coatings and cleanup materials employed, in tons [this is calculated by summing the daily OC emission rates, from Section A.III.1, for the calendar year, and then dividing by 2000].

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coatings and cleanup materials usage restriction of 10 gallons. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 65.3 pounds. The reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
less than 10 gallons of coatings and cleanup materials, combined, per day  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.b Emission Limitation:  
65.3 lbs of OC/day, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.c Emission Limitation:  
2.36 tons of OC/yr, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and A.III.2. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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:** Automatic Adhesive Spray Machine No. 1 (B30-1) (K004)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 1 (B30-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

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

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 1 (B30-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Paint Spray Machine No. 1 (B40-1) (K006)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 1 (B40-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Automatic Adhesive Spray Machine No. 2 (B95-1) (K009)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 2 (B95-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-10256)	160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 2 (B95-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Paint Spray Machine No.2 (B77-1) (K010)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 2 (B77-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## **2. Additional Terms and Conditions (continued)**

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## **II. Operational Restrictions**

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Adhesive Coating Machine (Roller Coat) (B94) (K011)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive coating machine (roller coat)(B94)	OAC rule 3745-31-05(A) (PTI #03-10256)	7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  1.46 lbs of organic compounds (OC)/hr, 6.39 tons of OC/yr, including cleanup materials  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.
	OAC rule 3745-31-05(D) (PTI #03-10256)	160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:  
  
The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c The 1.46 lbs of OC/hr and 6.39 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

## **2. Additional Terms and Conditions (continued)**

- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## **II. Operational Restrictions**

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.1.1 of the terms and conditions of this permit on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

## **V. Testing Requirements**

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

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

- 1.a** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 1.b** Emission Limitations:  
1.46 lbs of OC/hr, 6.39 tons of OC/yr, including cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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:** Manual Adhesive Spray Machine No. 3 (B75-1) (K013)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
manual adhesive spray machine no. 3 (B75-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  2.92 lbs/hr of organic compounds (OC), 12.79 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 2.92 lbs of OC/hr and 12.79 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
2.92 lbs of OC/hr, 12.79 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
manual adhesive spray machine no. 3 (B75-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Manual Adhesive Spray Machine No. 4 (B165-1) (K016)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
manual adhesive spray machine no. 4 (B165-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  2.92 lbs/hr of organic compounds (OC), 12.79 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

##### 2. Additional Terms and Conditions

- For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.

- 2.c** The 2.92 lbs of OC/hr and 12.79 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

#### IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.d Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

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

- 1.e** Emission Limitations:  
2.92 lbs of OC/hr, 12.79 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
manual adhesive spray machine no. 4 (B165-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

3. 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:
- changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - 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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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:** Automatic Adhesive Spray Machine No. 3 (B123-1) (K017)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 3 (B123-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

## V. Testing Requirements (continued)

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## VI. Miscellaneous Requirements

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 3 (B123-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

3. 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:
- changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - 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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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:** Automatic Adhesive Spray Machine No. 4 (B124-1) (K018)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 4 (B124-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 4 (B124-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Paint Spray Machine No. 3 (B139-1) (K019)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 3 (B139-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Paint Spray Machine No. 4 (B247-1) (K023)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 4 (B247-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Automatic Adhesive Spray Machine No. 6 (B300-1) (K025)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 6 (B300-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

## V. Testing Requirements (continued)

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## VI. Miscellaneous Requirements

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 6 (B300-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Paint Spray Machine No. 5 (B314-1) (K026)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 5 (B314-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## **2. Additional Terms and Conditions (continued)**

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## **II. Operational Restrictions**

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Hose Adhesive Coating Machine (H88) (K029)

**Activity Description:** Braided yarn covered rubber hose is coated with rubber adhesive via dripping onto surface, then dried

#### 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>
hose adhesive coating machine (H88)	OAC rule 3745-31-05(A) (PTI #03-9772)	1.60 lbs of organic compounds (OC)/hr, 3.61 tons of OC/rolling, 12-month summation of the monthly OC emission rates
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The 1.60 lbs of OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.c The OC content of the cleanup materials shall not exceed 7.27 lbs/gallon.

##### II. Operational Restrictions

1. The maximum combined annual coatings and cleanup materials usage rate, for this emissions unit, shall not exceed 993 gallons, based upon a rolling, 12-month summation of the monthly coatings and cleanup materials usage rates.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC emissions for each coating and cleanup material employed (b x c), in pounds;
  - e. the total OC emissions for all of the coatings and cleanup materials employed, in tons (summation of d for all coatings and cleanup materials, divided by 2000);
  - f. the rolling, 12-month summation of the monthly OC emission rates, in tons;
  - g. the total number of gallons of all the coatings employed;
  - h. the total number of gallons of all the cleanup materials employed;
  - i. the total number of gallons of all the coatings and cleanup materials employed (g + h); and
  - j. the rolling, 12-month summation of the monthly usage rates of all the coatings and cleanup materials, in gallons.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 3.61 tons for this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the cleanup materials OC content limitation of 7.27 pounds/gallon.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month coatings and cleanup materials usage restriction of 993 gallons.
4. These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports that summarize the actual annual OC emissions and the combined, coatings and cleanup materials usage rates (in gallons) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
1.60 lbs of OC/hr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance as follows:
    - i. multiply the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon);
    - ii. multiply the maximum cleanup materials usage rate (gallons/hr) by the maximum OC content of all the cleanup materials (lbs/gallon); and
    - iii. add i. and ii.

**V. Testing Requirements (continued)**

- 1.b** Emission Limitation:  
3.61 tons of OC/rolling, 12-month summation of the monthly OC emission rates
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
- 1.c** Emission Limitation:  
993 gallons of coatings and cleanup materias usagel, based upon a rolling, 12-month summation
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
- 1.d** Emission Limitation:  
7.27 lbs/gallon (for the cleanup materials)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and cleanup materials.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hose adhesive coating machine (H88)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-9772 issued on November 20, 1996: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 2 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: toluene  
 TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 1.60  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 15.2  
 MAGLC (ug/m3): 4,476

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

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

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

4. 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:** Automatic Adhesive Spray Machine No. 7 (B360-1) (K030)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 7 (B360-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 7 (B360-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Automatic Adhesive Spray Machine No. 8 (B361-1) (K031)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 8 (B361-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## **VI. Miscellaneous Requirements**

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 8 (B361-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Automatic Adhesive Spray Machine No. 9 (B362-1) (K032)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
automatic adhesive spray machine no. 9 (B362-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  7.0 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents  7.08 lbs/hr of organic compounds (OC), 31.01 tons of OC/yr, including cleanup materials
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.d.

## 2. Additional Terms and Conditions

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:
- The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 7.08 lbs of OC/hr and 31.01 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-10256, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC input rate limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

## V. Testing Requirements (continued)

- 1.d** Emission Limitation:  
7.0 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 1.e** Emission Limitations:  
7.08 lbs of OC/hr, 31.01 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission rate as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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

## VI. Miscellaneous Requirements

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
automatic adhesive spray machine no. 9 (B362-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials, were assumed to be ethyl benzene which has the lowest TLV of all the remaining compounds.

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

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

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

4. 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:** Manual Adhesive Spray Machine No. 5 (B365-1) (K033)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
manual adhesive spray machine no. 5 (B365-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A) (PTI #03-13454)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  for the primer coatings usage:  4.90 lbs of organic compounds (OC)/hr, 7.27 tons of OC/yr  6.37 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  for the finish coatings usage:  6.60 lbs of OC/hr, 13.58 tons of OC/yr  6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents  for the cleanup materials usage:  0.07 ton of OC/month, 0.87 ton of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13454)	160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.e.

**2. Additional Terms and Conditions**

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:  
  
 The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 4.90 lbs of OC/hr emission limitation for the primer coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

## 2. Additional Terms and Conditions (continued)

- 2.d** The 6.60 lbs of OC/hr emission limitation for the finish coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.e** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13454, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.
3. The maximum annual primer coatings usage rate for this emissions unit shall not exceed 2,283 gallons.
4. The maximum annual finish coatings usage rate for this emissions unit shall not exceed 4,036 gallons.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.

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

4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, identification number, and type (primer or finish) of each coating employed; and
  - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
5. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each primer coating and finish coating employed;
  - b. the OC content of each primer coating and finish coating employed, in pounds/gallon, as applied;
  - c. the number of gallons of each primer coating and finish coating employed;
  - d. the total OC emissions for each primer coating and finish coating employed (b x c), in pounds;
  - e. the total OC emissions for all the primer coatings and all the finish coatings employed, in tons (summations of d for all primer coatings and all the finish coatings, divided by 2000); and
  - f. the total number of gallons of all the primer coatings and all the finish coatings employed.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - i. all exceedances of the rolling, 12-month OC emission limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined); and
  - ii. all exceedances of the monthly cleanup materials OC limitation of 0.07 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying primer and finish coatings (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from the primer coatings usage, the finish coatings usage and the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

- 1.a** Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emission limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.b** Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.c** Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.d** Emission Limitations:  
4.90 lbs of OC/hr, 7.27 tons of OC/yr (from the primer coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable primer coatings usage rate (gallons/year) by the maximum OC content of all the primer coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual primer coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.e** Emission Limitation:  
6.37 lbs of VOC per gallon of coating, excluding water and exempt solvents (for the primer coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

## V. Testing Requirements (continued)

- 1.f** Emission Limitations:  
6.60 lbs of OC/hr, 13.58 tons of OC/yr (from the finish coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum finish coatings usage rate (gallons/hr) by the maximum OC content of all the finish coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable finish coatings usage rate (gallons/year) by the maximum OC content of all the finish coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual finish coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.g** Emission Limitation:  
6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents (for finish coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.h** Emission Limitations:  
0.07 ton of OC/month, 0.87 ton of OC/yr (from the cleanup materials usage)

Applicable Compliance Method:

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

Compliance with the annual limitation shall be based upon the record keeping requirements specified in Section A.III.2. of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- 1.i** Usage Restriction:  
2,283 gallons/yr of primer coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

- 1.j** Usage Restriction:  
4,036 gallons/yr of finish coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

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

## VI. Miscellaneous Requirements

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
manual adhesive spray machine no. 5 (B365-1)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13454: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3,353  
MAGLC (ug/m3): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m3): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,220  
MAGLC (ug/m3): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m3): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2,225  
MAGLC (ug/m3): 4,048

Pollutant: toluene  
TLV (mg/m3): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1,418  
MAGLC (ug/m3): 4,476

Pollutant: xylene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 9,758  
MAGLC (ug/m3): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

**2.b** The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials were assumed to be ethyl benzene which has the lowest TLV of the remaining compounds.

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

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

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

4. 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:** Adhesive Dipping Machine No. 3 (B370) (K034)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine no. 3 (B370)	OAC rule 3745-31-05(A) (PTI #03-13454)	for the primer coatings usage:  4.52 lbs of organic compounds (OC)/hr, 6.70 tons of OC/yr  6.37 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
		for the finish coatings usage:  5.12 lbs of OC/hr, 8.63 tons of OC/yr  6.57 lbs of VOC per gallon of coating, excluding water and exempt solvents
		for the cleanup materials usage:  0.36 ton of OC/month, 4.36 tons of OC/yr
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-31-05(D) (PTI #03-13454)	
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.e.

## 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c The 4.52 lbs of OC/hr emission limitation for the primer coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.d The 5.12 lbs of OC/hr emission limitation for the finish coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.e Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13454, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

- 1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.
- 2. The maximum annual primer coatings usage rate for this emissions unit shall not exceed 2,104 gallons.
- 3. The maximum annual finish coatings usage rate for this emissions unit shall not exceed 2,629 gallons.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
- 2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, identification number, and type (primer or finish) of each coating employed; and
  - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each primer coating and finish coating employed;
  - b. the OC content of each primer coating and finish coating employed, in pounds/gallon, as applied;
  - c. the number of gallons of each primer coating and finish coating employed;
  - d. the total OC emissions for each primer coating and finish coating employed (b x c), in pounds;
  - e. the total OC emissions for all the primer coatings and all the finish coatings employed, in tons (summations of d for all primer coatings and all the finish coatings, divided by 2000); and
  - f. the total number of gallons of all the primer coatings and all the finish coatings employed.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - i. all exceedances of the rolling, 12-month OC emission limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined); and
  - ii. all exceedances of the monthly cleanup materials OC limitation of 0.36 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying primer and finish coatings (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions from the primer coatings usage, the finish coatings usage and the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

**1.a** Emission Limitations:

4.52 lbs of OC/hr, 6.70 tons of OC/yr (from the primer coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable primer coatings usage rate (gallons/year) by the maximum OC content of all the primer coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual primer coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

**1.b** Emission Limitation:

6.37 lbs of VOC per gallon of coating, excluding water and exempt solvents (for primer coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

**1.c** Emission Limitation:

160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.f** Emission Limitations:

5.12 lbs of OC/hr, 8.63 tons of OC/yr (from the finish coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum finish coatings usage rate (gallons/hr) by the maximum OC content of all the finish coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable finish coatings usage rate (gallons/year) by the maximum OC content of all the finish coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual finish coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

**1.g** Emission Limitation:

6.57 lbs of VOC per gallon of coating, excluding water and exempt solvents (for finish coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

**1.h** Emission Limitations:

0.36 ton of OC/month, 4.36 ton of OC/yr (from the cleanup materials usage)

Applicable Compliance Method:

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

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

**1.i** Usage Restriction:

2,104 gallons/yr of primer coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

**V. Testing Requirements (continued)**

- 1.j Usage Restriction:  
2,629 gallons/yr of finish coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

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

**VI. Miscellaneous Requirements**

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine no. 3 (B370)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13454: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

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

**2.a** Pollutant: ethyl benzene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 3,353  
MAGLC (ug/m<sup>3</sup>): 10,333

Pollutant: methyl isobutyl ketone  
TLV (mg/m<sup>3</sup>): 205  
Maximum Hourly Emission Rate (lbs/hr): 23.87\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,220  
MAGLC (ug/m<sup>3</sup>): 4,881

Pollutant: tetrachloroethylene  
TLV (mg/m<sup>3</sup>): 170  
Maximum Hourly Emission Rate (lbs/hr): 2.99\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 2,225  
MAGLC (ug/m<sup>3</sup>): 4,048

Pollutant: toluene  
TLV (mg/m<sup>3</sup>): 188  
Maximum Hourly Emission Rate (lbs/hr): 16.46\*\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1,418  
MAGLC (ug/m<sup>3</sup>): 4,476

Pollutant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 13.12\*\*\*  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 9,758  
MAGLC (ug/m<sup>3</sup>): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

\*\* represents the combined maximum emission rate for K004, K005, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033 and K034

\*\*\*\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P055 and P056

**2.b** The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials were assumed to be ethyl benzene which has the lowest TLV of the remaining compounds.

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

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

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

4. 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:** Paint Spray Machine No. 6 (Auto) (B491-1) (K035)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 6 (B491-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

**V. Testing Requirements (continued)**

**1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Paint Spray Machine No. 7 (Auto) (B510-1) (K036)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 7 (B510-1)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-10256)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## **2. Additional Terms and Conditions (continued)**

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## **II. Operational Restrictions**

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

## V. Testing Requirements (continued)

- 1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Manual Adhesive Dipping & Crimping Machine (A12) (K039)

**Activity Description:** Manual Surface Coating Operation For Miscellaneous Metal Parts For EFI Hose Products Using A VOC Non-Compliant Coating

**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>
manual adhesive dipping and crimping machine (A12)	OAC rule 3745-31-05(A)(3) (PTI #03-13454)	Coatings usage shall be less than 10 gallons per day.  64.2 lbs of organic compounds (OC)/day, 0.70 ton of OC/yr, for the coatings usage  0.05 ton of OC/month, 0.65 ton of OC/yr, for the cleanup materials usage
	OAC rule 3745-21-09(U)(2)(e)	See A.I.2.b.

**2. Additional Terms and Conditions**

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The usage restriction specified by this rule is less stringent than the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

**II. Operational Restrictions**

**None**

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all the coatings employed;
  - d. the OC content of each coating employed, in pounds/gallon;
  - e. the OC emission rate for each coating employed, in pounds (b x d); and
  - f. the total OC emission rate for all the coatings employed, in pounds (summation of e for all coatings).
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
3. The permittee shall collect and record each year the following for this emissions unit:
  - a. the OC emissions for all the coatings employed, in tons [this is calculated by summing the daily OC emission rates, from Section A.III.1, for the calendar year, and then dividing by 2000]; and
  - b. the OC emissions for all the cleanup materials employed, in tons [this is calculated by summing the daily OC emission rates, from Section A.III.2, for the calendar year, and then dividing by 2000].

### **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the daily OC emission limitation of 64.2 pounds; and
  - b. all exceedances of the monthly cleanup material OC limitation of 0.05 ton.

These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the actual annual OC emissions from the coatings usage and the actual annual OC emissions from the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

### **V. Testing Requirements**

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

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

- 1.a** Emission Limitation:  
Coatings usage shall be less than 10 gallons per day.
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
- 1.b** Emission Limitation:  
64.2 lbs of OC/day, for the coatings usage
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
- 1.c** Emission Limitation:  
0.70 ton of OC/yr, for the coatings usage
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and A.III.3. of this permit.
- 1.d** Emission Limitation:  
0.05 ton of OC/month, from the cleanup materials usage
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.2. of this permit.
- 1.e** Emission Limitation:  
0.65 ton of OC/yr, from the cleanup materials usage
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.3. of this permit.
- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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:** Adhesive Dipping Machine No. 2 (A64) (K040)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Electronic Fuel Injection Hose Using A VOC Non-Compliant Coating

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine no. 2 (A64)	OAC rule 3745-31-05(A)(3) (PTI #03-13454)	Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  65.3 lbs of organic compounds (OC)/day, 1.71 tons of OC/yr, including cleanup materials
	OAC rule 3745-21-09(U)(2)	See A.I.2.b.

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The usage restriction specified by this rule is less stringent than the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

None

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed;
  - c. the total volume, in gallons, of all the coatings and cleanup materials employed;
  - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - e. the OC emission rate for each coating and cleanup material, in pounds (b x d); and
  - f. the total OC emission rate for all the coatings and cleanup materials employed, in pounds (summation of e for all the coatings and cleanup materials).

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

2. The permittee shall collect and record each year the OC emissions for all the coatings and cleanup materials employed, in tons [this is calculated by summing the daily OC emission rates, from Section A.III.1, for the calendar year, and then dividing by 2000].

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coatings and cleanup materials usage restriction of 10 gallons. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 65.3 pounds. The reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.b Emission Limitation:  
65.3 lbs of OC/day, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.c 1.71 tons of OC/yr, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and A.III.2. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

### VI. Miscellaneous Requirements

**None**

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

**Emissions Unit ID:** Adhesive Dipping Machine No. 2 (A64) (K040)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Electronic Fuel Injection Hose Using A VOC Non-Compliant Coating

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine no. 2 (A64)	OAC rule 3745-31-05(A)(3) (PTI #03-13454)	Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  65.3 lbs of organic compounds (OC)/day, 1.71 tons of OC/yr, including cleanup materials
	OAC rule 3745-21-09(U)(2)	See A.I.2.b.

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The usage restriction specified by this rule is less stringent than the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

None

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed;
  - c. the total volume, in gallons, of all the coatings and cleanup materials employed;
  - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - e. the OC emission rate for each coating and cleanup material, in pounds (b x d); and
  - f. the total OC emission rate for all the coatings and cleanup materials employed, in pounds (summation of e for all the coatings and cleanup materials).

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

2. The permittee shall collect and record each year the OC emissions for all the coatings and cleanup materials employed, in tons [this is calculated by summing the daily OC emission rates, from Section A.III.1, for the calendar year, and then dividing by 2000].

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coatings and cleanup materials usage restriction of 10 gallons. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 65.3 pounds. The reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.b Emission Limitation:  
65.3 lbs of OC/day, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.c 1.71 tons of OC/yr, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and A.III.2. of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine no. 2 (A64)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13454: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: methyl isobutyl ketone  
 TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):545.7

MAGLC (ug/m3): 4,881

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

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

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

4. 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:** Paint Spray Machine No. 8 (B602-1,2) (K041)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating

#### 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 spray machine no. 8 (B602-1,2)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-31-05(A) (PTI #03-13454)	0.10 lb/hr of particulate emissions (PE), 0.44 ton of PE/yr  0% opacity, as a six-minute average  0.33 lb/hr of organic compounds (OC), 1.44 tons of OC/yr, including cleanup material
	OAC rule 3745-31-05(D) (PTI #03-13454)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).  8.0 tons of OC/rolling, 12-month period (See A.I.2.b and A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## 2. Additional Terms and Conditions (continued)

- 2.b** The 0.33 lb of OC/hr and 1.44 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The permittee shall not employ OCs (for coatings and cleanup materials, combined) in the anti-vibration water-borne coatings operations (emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined) at an input rate that would exceed 8 tons per rolling, 12-month summation of the combined monthly OC input rates.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or 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 identify all exceedances of the rolling, 12-month OC emission limitation of 8 tons (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined). All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this emissions unit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

#### IV. Reporting Requirements (continued)

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.b Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.c Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

- 1.d** Emission Limitations:  
0.33 lb of OC/hr, 1.44 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation as follows:

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

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.e** Emission Limitation:  
8.0 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K006, K010, K019, K023, K026, K035, K036 and K041, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the VOC/OC contents of all the coatings and the OC contents of all the 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:** Hose Adhesive Application Machine (H192) (K042)

**Activity Description:** Braided yarn covered rubber hose is coated with rubber adhesive via dripping onto surface, then dried

#### 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>
hose adhesive application machine (H192)	OAC rule 3745-31-05(A) (PTI #03-13454)	0.20 lb of organic compounds (OC)/hr, 0.88 ton of OC/yr
	OAC rule 3745-21-07(G)(2)	See A.I.2.a.

##### 2. Additional Terms and Conditions

- 2.a The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The 0.20 lb of OC/hr and 0.88 ton of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

##### II. Operational Restrictions

None

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

None

##### IV. Reporting Requirements

None

##### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitations:  
0.20 lb of OC/hr, 0.88 ton of OC/yr

Applicable Compliance Method:

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

The annual limitation was calculated by multiplying the hourly limitation by 8,760, and then dividing by 2,000. Therefore, provided that compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed.

**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>
hose adhesive application machine (H192)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

**Emissions Unit ID:** Manual Adhesive Spray Machine (B540) (K043)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

#### 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>
manual adhesive spray machine (B540)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A) (PTI #03-13454)	0.10 lb of particulate emissions (PE)/hr, 0.44 ton of PE/yr  0% opacity, as a six-minute average  for the primer coatings usage:  5.35 lbs of organic compounds (OC)/hr, 5.17 tons of OC/yr  6.37 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents  for the finish coatings usage:  7.27 lbs of OC/hr, 7.53 tons of OC/yr  6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents  for the cleanup materials usage:  0.07 ton of OC/month, 0.87 ton of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI #03-13454)	160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.e.

**2. Additional Terms and Conditions**

- 2.a** For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b** The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:  
  
 The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c** The 5.35 lbs of OC/hr emission limitation for the primer coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.d** The 7.27 lbs of OC/hr emission limitation for the finish coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

## 2. Additional Terms and Conditions (continued)

- 2.e** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13454, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.
2. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.
3. The maximum annual primer coatings usage rate for this emissions unit shall not exceed 1,624 gallons.
4. The maximum annual finish coatings usage rate for this emissions unit shall not exceed 2,238 gallons.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
3. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, identification number, and type (primer or finish) of each coating employed; and
  - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

5. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each primer coating and finish coating employed;
  - b. the OC content of each primer coating and finish coating employed, in pounds/gallon, as applied;
  - c. the number of gallons of each primer coating and finish coating employed;
  - d. the total OC emissions for each primer coating and finish coating employed (b x c), in pounds;
  - e. the total OC emissions for all the primer coatings and all the finish coatings employed, in tons (summations of d for all primer coatings and all the finish coatings, divided by 2000); and
  - f. the total number of gallons of all the primer coatings and all the finish coatings employed.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - i. all exceedances of the rolling, 12-month OC emission limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined); and
  - ii. all exceedances of the monthly cleanup materials OC limitation of 0.07 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying primer and finish coatings (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from the primer coatings usage, the finish coatings usage and the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

- 1.a** Emission Limitations:  
0.10 lb of PE/hr, 0.44 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 35%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.b** Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.c** Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.d** Emission Limitations:  
5.35 lbs of OC/hr, 5.17 tons of OC/yr (from the primer coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable primer coatings usage rate (gallons/year) by the maximum OC content of all the primer coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual primer coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.e** Emission Limitation:  
6.37 lbs of VOC per gallon of coating, excluding water and exempt solvents (for the primer coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

## V. Testing Requirements (continued)

- 1.f** Emission Limitations:  
7.27 lbs of OC/hr, 7.53 tons of OC/yr (from the finish coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum finish coatings usage rate (gallons/hr) by the maximum OC content of all the finish coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable finish coatings usage rate (gallons/year) by the maximum OC content of all the finish coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual finish coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.g** Emission Limitation:  
6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents (for finish coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.h** Emission Limitations:  
0.07 ton of OC/month, 0.87 ton of OC/yr (from the cleanup materials usage)

Applicable Compliance Method:

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

Compliance with the annual limitation shall be based upon the record keeping requirements specified in Section A.III.2. of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- 1.i** Usage Restriction:  
1,624 gallons/yr of primer coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

- 1.j** Usage Restriction:  
2,238 gallons/yr of finish coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

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

## VI. Miscellaneous Requirements

- 1.** The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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>
manual adhesive spray machine (B540)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13454: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 or ISCST3 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 or ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:
  - 2.a Pollutant: methyl isobutyl ketone\*  
 TLV (mg/m3): 205  
 Maximum Hourly Emission Rate (lbs/hr): 4.92  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,659  
 MAGLC (ug/m3): 4,881
  - Pollutant: toluene\*\*  
 TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 3.92  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,916  
 MAGLC (ug/m3): 4,476

\* methyl isobutyl ketone was modeled for the primer coatings operation

\*\* toluene was modeled for the finish coatings operation

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

3. 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:
- changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - 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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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:** Manual Paint Spray Machine (B210) (K044)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating

#### 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>
manual paint spray machine no. 5 (hand)(B210)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-13454)	Coatings and cleanup materials usages, combined, shall be less than 10 gallons per day.  57.6 lbs of organic compounds (OC)/day, 2.54 tons of OC/yr, including cleanup materials  0.03 lb/hr of particulate emissions (PE), 0.14 ton of PE/yr
	OAC rule 3745-21-09(U)(2)(e)	0% opacity, as a six-minute average The usage restriction specified by this rule is less stringent than the usage restriction established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- For purposes of federal enforceability, all OCs are considered to be VOCs.

##### II. Operational Restrictions

- The permittee shall operate either a water wash or dry filtration system whenever this emission units is in operation.

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

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the volume, in gallons, of each coating and cleanup material employed;
  - c. the total volume, in gallons, of all coatings and cleanup materials employed;
  - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - e. the OC emission rate for each coating and cleanup material, in pounds (b x d); and
  - f. the total OC emission rate for all the coatings and cleanup materials, in pounds (summation of e for all coatings and cleanup materials).
2. The permittee shall collect and record each year the OC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the daily OC emissions, from Section A.III.1., for the calendar year, and then dividing by 2000).
3. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coatings and cleanup materials usage restriction of 10 gallons. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 57.6 pounds. The reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
Coatings and cleanup materials, combined, shall be less than 10 gallons per day.  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.
  - 1.b Emission Limitation:  
57.6 lbs of OC/day, including cleanup materials  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

## V. Testing Requirements (continued)

- 1.c** Emission Limitation:  
2.54 tons of OC/yr, including cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and A.III.2. of this permit.

- 1.d** Emission Limitations:  
0.03 lb of PE/hr, 0.14 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.e** Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

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

## VI. Miscellaneous Requirements

- 1.** This emissions unit is operating in violation of the PE limitation established in PTI #03-13454. [This was as a result of revising the transfer efficiency of the paint spray machine from 75% to 25%. The revision was based on the May 25, 2001 comments submitted by the permittee on its draft Title V permit issued on April 29, 2001.] As an initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

**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:** Paint Auto Spray (B640) (K045)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

**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 auto spray (B640)	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A) (PTI #03-13454)	for the coatings usage:  57.80 lbs of organic compounds (OC)/day, 10.55 tons of OC/yr  0.07 lb of particulate emissions (PE)/hr, 0.33 ton of PE/yr  0% opacity, as a six-minute average  for the cleanup materials usage:  0.02 ton of OC/month, 0.24 ton of OC/yr
	OAC rule 3745-21-09(U)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2).  Coatings usage shall be less than 10 gallons per day.

**2. Additional Terms and Conditions**

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.

## **2. Additional Terms and Conditions (continued)**

- 2.b** The 57.80 lbs of OC/day emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

## **II. Operational Restrictions**

1. The permittee shall operate either a water wash or dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the coating line:
  - a. The name and identification number of each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all of the coatings employed.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.

## **IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 0.02 ton for cleanup materials. The reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

- 1.a** Emission Limitations:  
57.80 lbs of OC/day, 10.55 tons of OC/yr, from the coatings usage

Applicable Compliance Method:

Compliance with the daily allowable emission limitation shall be determined by multiplying the maximum daily coatings usage rate (gallons/day) by the maximum OC content of all the coatings (lbs/gallon).

Compliance with the annual limitation shall be assumed as long as compliance with the daily limitation is maintained (the annual limitation was calculated by multiplying the daily limitation by 365, and then dividing by 2000).

- 1.b** Emission Limitation:  
Coatings usage shall be less than 10 gallons per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2. of this permit.

- 1.c** Emission Limitations:  
0.07 lb of PE/hr, 0.33 ton of PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

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 (assumed to be 25%)

CE = control efficiency of the control equipment (assumed to be 90%)

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly limit above pursuant to OAC rule 3745-17-03(B)(10).

- 1.d** Emission Limitation:  
0% opacity, as a six-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with Method 9, 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitations:  
0.02 ton of OC/month, 0.24 ton of OC/yr, from the cleanup materials usage

Applicable Compliance Method:

Compliance with the monthly limitation shall be based upon the record keeping requirements specified in Section A.III.3. of this permit.

Compliance with the annual limitation shall be based upon the record keeping requirements specified in Section A.III.3. of this permit and shall be the summation of the monthly OC emission rates for the calendar year.

## **VI. Miscellaneous Requirements**

1. This emissions unit is operating in violation of the PE limitation established in PTI #03-13454. [This was as a result of revising the transfer efficiency of the paint spray machine from 75% to 25%. The revision was based on the May 25, 2001 comments submitted by the permittee on its draft Title V permit issued on April 29, 2001.] As an initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

**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 auto spray (B640)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

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

Pollutant: toluene  
 TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 2.40  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 4,345  
 MAGLC (ug/m3): 4,476

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

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that 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:** Adhesive Dipping Machine (B650,1) (K046)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine (B650,1 and B650,2)	OAC rule 3745-31-05(A) (PTI #03-13454)	for the primer coatings usage:  5.67 lbs of organic compounds (OC)/hr, 4.85 tons of OC/yr  6.37 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
		for the finish coatings usage:  6.39 lbs of OC/hr, 5.41 tons of OC/yr  6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents
		for the cleanup materials usage:  0.18 ton of OC/month, 2.18 tons of OC/yr
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-31-05(D) (PTI #03-13454)	
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.e.

## 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c The 5.67 lbs of OC/hr emission limitation for the primer coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.d The 6.39 lbs of OC/hr emission limitation for the finish coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.e Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13454, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

- 1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.
- 2. The maximum annual primer coatings usage rate for this emissions unit shall not exceed 1,523 gallons.
- 3. The maximum annual finish coatings usage rate for this emissions unit shall not exceed 1,608 gallons.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
- 2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, identification number, and type (primer or finish) of each coating employed; and
  - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each primer coating and finish coating employed;
  - b. the OC content of each primer coating and finish coating employed, in pounds/gallon, as applied;
  - c. the number of gallons of each primer coating and finish coating employed;
  - d. the total OC emissions for each primer coating and finish coating employed (b x c), in pounds;
  - e. the total OC emissions for all the primer coatings and all the finish coatings employed, in tons (summations of d for all primer coatings and all the finish coatings, divided by 2000); and
  - f. the total number of gallons of all the primer coatings and all the finish coatings employed.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - i. all exceedances of the rolling, 12-month OC emission limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined); and
  - ii. all exceedances of the monthly cleanup materials OC limitation of 0.18 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying primer and finish coatings (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions from the primer coatings usage, the finish coatings usage and the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitations:  
5.67 lbs of OC/hr, 4.85 tons of OC/yr (from the primer coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum primer coatings usage rate (gallons/hr) by the maximum OC content of all the primer coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable primer coatings usage rate (gallons/year) by the maximum OC content of all the primer coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual primer coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.b** Emission Limitation:  
6.37 lbs of VOC per gallon of coating, excluding water and exempt solvents (for primer coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.c** Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.f** Emission Limitations:  
6.39 lbs of OC/hr, 5.41 tons of OC/yr (from the finish coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum finish coatings usage rate (gallons/hr) by the maximum OC content of all the finish coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable finish coatings usage rate (gallons/year) by the maximum OC content of all the finish coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual finish coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.g** Emission Limitation:  
6.73 lbs of VOC per gallon of coating, excluding water and exempt solvents (for finish coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.h** Emission Limitations:  
0.18 ton of OC/month, 2.18 tons of OC/yr (from the cleanup materials usage)

Applicable Compliance Method:

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

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

- 1.i** Usage Restriction:  
1,523 gallons/yr of primer coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

**V. Testing Requirements (continued)**

- 1.j Usage Restriction:  
1,608 gallons/yr of finish coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

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

**VI. Miscellaneous Requirements**

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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:** Adhesive Dipping Machine (B657,1) (K048)

**Activity Description:** Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Non-Compliant Coating.

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive dipping machine (B657,1 and B657,2)	OAC rule 3745-31-05(A) (PTI #03-13454)	for the primer coatings usage:  3.88 lbs of organic compounds (OC)/hr, 5.30 tons of OC/yr  6.37 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
		for the finish coatings usage:  4.53 lbs of OC/hr, 5.75 tons of OC/yr  6.57 lbs of VOC per gallon of coating, excluding water and exempt solvents
		for the cleanup materials usage:  0.18 ton of OC/month, 2.18 tons of OC/yr
	OAC rule 3745-31-05(D) (PTI #03-13454)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(f) and 3745-31-05(D).  160 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.e.

## 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The permittee shall not employ coatings and cleanup materials in the anti-vibration adhesive coatings operations (emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined) at an input rate that would exceed 160 tons of OC per rolling, 12-month summation of the monthly OC input rates.
- 2.c The 3.88 lbs of OC/hr emission limitation for the primer coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.d The 4.53 lbs of OC/hr emission limitation for the finish coating line was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.e Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 03-13454, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

- 1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.
- 2. The maximum annual primer coatings usage rate for this emissions unit shall not exceed 1,665 gallons.
- 3. The maximum annual finish coatings usage rate for this emissions unit shall not exceed 1,753 gallons.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total OC input rate for each coating and cleanup material employed (b x c), in pounds; and
  - e. the total OC input rate for all the coatings and cleanup materials employed, in tons (summation of d for all the coatings and cleanup materials, divided by 2000); and
  - f. the rolling, 12-month summation of the monthly OC input rates, in tons.
- 2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, identification number, and type (primer or finish) of each coating employed; and
  - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds/gallon;
  - c. the total volume, in gallons, of each cleanup material employed;
  - d. the total emissions of OC for each cleanup material employed (b x c), in pounds; and
  - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials, divided by 2000), in tons.
4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each primer coating and finish coating employed;
  - b. the OC content of each primer coating and finish coating employed, in pounds/gallon, as applied;
  - c. the number of gallons of each primer coating and finish coating employed;
  - d. the total OC emissions for each primer coating and finish coating employed (b x c), in pounds;
  - e. the total OC emissions for all the primer coatings and all the finish coatings employed, in tons (summations of d for all primer coatings and all the finish coatings, divided by 2000); and
  - f. the total number of gallons of all the primer coatings and all the finish coatings employed.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - i. all exceedances of the rolling, 12-month OC emission limitation of 160 tons (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined); and
  - ii. all exceedances of the monthly cleanup materials OC limitation of 0.18 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying primer and finish coatings (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports that summarize the actual annual OC emissions from the primer coatings usage, the finish coatings usage and the cleanup materials usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual reports that summarize the actual annual OC emissions from emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year

### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**V. Testing Requirements (continued)**

- 1.a** Emission Limitations:  
3.88 lbs of OC/hr, 5.30 tons of OC/yr (from the primer coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum primer coatings usage rate (gallons/hr) by the maximum OC content of all the primer coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable primer coatings usage rate (gallons/year) by the maximum OC content of all the primer coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual primer coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.b** Emission Limitation:  
6.37 lbs of VOC per gallon of coating, excluding water and exempt solvents (for primer coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.c** Emission Limitation:  
160 tons of OC/rolling, 12-month summation of the monthly OC input rates (for emissions units K004, K009, K011, K013, K016, K017, K018, K025, K030, K031, K032, K033, K034, K043, K046 and K048, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.f** Emission Limitations:  
4.53 lbs of OC/hr, 5.75 tons of OC/yr (from the finish coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum finish coatings usage rate (gallons/hr) by the maximum OC content of all the finish coatings (lbs/gallon).

The annual emission limitation was developed by multiplying the maximum annual allowable finish coatings usage rate (gallons/year) by the maximum OC content of all the finish coatings (lbs/gallon), and then dividing by 2,000. Therefore, as long as compliance with the annual finish coatings usage rate is maintained, compliance with the annual OC limitation shall be ensured.

- 1.g** Emission Limitation:  
6.57 lbs of VOC per gallon of coating, excluding water and exempt solvents (for finish coatings)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

- 1.h** Emission Limitations:  
0.18 ton of OC/month, 2.18 tons of OC/yr (from the cleanup materials usage)

Applicable Compliance Method:

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

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

- 1.i** Usage Restriction:  
1,665 gallons/yr of primer coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

**V. Testing Requirements (continued)**

- 1.j Usage Restriction:  
1,753 gallons/yr of finish coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.5. of this permit.

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

**VI. Miscellaneous Requirements**

1. The permittee shall submit annual reports on the progress achieved in converting the current noncomplying coatings employed to coatings that comply with the requirements of OAC rule 3745-21-09(U)(1) for this emissions unit. The annual reports shall be submitted by January 31 of each year and shall cover the progress achieved during the previous calendar year. This requirement shall cease once all the coatings employed in this emissions unit comply with the VOC content limitation required by OAC rule 3745-21-09(U)(1)(c).

**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:** Open Top Vapor Degreaser w/ Carbon Absorption (B3-1,2) (L001)

**Activity Description:** Metal Cleaning Operation Using Chlorinated Solvent.  
 This Emission Unit Has A Carbon Adsorption Recovery Unit Installed.

#### 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>
open top vapor degreaser (B3-1, 2), with 1.0 freeboard ratio, freeboard refrigeration device and reduced room draft (this emissions unit also employs a carbon adsorption system as BAT)	40 CFR, Part 63, Subpart T	See A.I.2.a.
	OAC rule 3745-31-05(A)(3) (PTI #03-3758)	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T.
	OAC rule 3745-21-09(O)(3)	See A.I.2.b. exempt, pursuant to OAC rule 3745-21-09(O)(6) (See A.I.2.c.)

##### 2. Additional Terms and Conditions

- 2.a The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
  - i. The solvent cleaning machine shall use reduced room draft that ensures that the flow or movement across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
  - ii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
  - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

## 2. Additional Terms and Conditions (continued)

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

vi. The solvent cleaning machine shall have a primary condenser.

vii. The permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

**2.b** All of the solvent vapors from this emissions unit shall be routed through the use of a lip exhaust to a carbon adsorption system. The permittee shall operate and maintain the carbon adsorption system, with ventilation greater than or equal to fifty cubic feet per minute per square foot of air/solvent interface (when the cover is open), and a concentration in the exhaust gases of less than twenty-five parts per million of solvent (averaged over one complete adsorption cycle).

**2.c** The exemption allowed in accordance with OAC rule 3745-21-09(O)(6) is not currently part of the federally-approved SIP. During the rulemaking process, Ohio EPA received confirmation from the USEPA concerning the acceptability of this exemption. Therefore, this exemption will be considered to be federally enforceable while SIP approval by USEPA is being obtained.

## II. Operational Restrictions

**1.** The permittee shall meet all of the following required work and operational practices:

**1.a** Control air disturbances across the solvent cleaning machine opening(s) by incorporating reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures described in the "Monitoring and/or Record Keeping Requirements" section of this permit. The permittee shall also establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Record Keeping Requirements" section of this permit.

**1.b** The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

**1.c** Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

**1.d** Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Director (appropriate District Office or local air agency).

**1.e** Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

**1.f** During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

**1.g** During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

**1.h** When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

**1.i** The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (appropriate District Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

## II. Operational Restrictions (continued)

- 1.j The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (appropriate District Office or local air agency).
- 1.k Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
- 1.l Sponges, fabric, wood, and paper products shall not be cleaned.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
  - d. If the permittee can demonstrate to the satisfaction of the Director (appropriate District Office or local air agency) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- 2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
  - b. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
  - c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
- 3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
  - a. The results of control device monitoring required in this section of the permit.
  - b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
  - c. Estimates of annual tetrachloroethylene consumption for the solvent cleaning machine.

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

4. The permittee shall measure and record the concentration of halogenated HAP solvent tetrachloroethylene in the exhaust of the carbon adsorber with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined as follows: (1) use a colorimetric detector tube designed to measure a concentration, in parts per million by volume of solvent in air, (2) use the colorimetric detector tube according to the manufacturer's instructions, and (3) provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; is downstream from no other inlet; and is 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
5. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
6. The permittee shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the wind speed within the enclosure using the procedures outlined in (6)(a) and (6)(b) below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.
  - a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
  - b. Record the maximum wind speed.

### IV. Reporting Requirements

1. The permittee shall submit an initial notification report to the Administrator of the U.S. EPA. Each initial notification report shall contain the following:
  - a. The name and address of the permittee.
  - b. The address (i.e., physical location) of the solvent cleaning machine.
  - c. A brief description of the solvent cleaning machine type, solvent/air interface area, and existing controls.
  - d. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine and its control devices were installed prior to, or after, November 2, 1993.
  - e. The anticipated compliance approach for the solvent cleaning machine.
  - f. An estimate of the annual tetrachloroethylene consumption for the solvent cleaning machine.
2. The permittee shall submit an initial statement of compliance to the Administrator of the U.S. EPA. Each initial statement of compliance shall contain the following:
  - a. The name and address of the permittee.
  - b. The address (i.e., physical location) of the solvent cleaning machine.
  - c. A list of the control equipment used to achieve compliance.
  - d. A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
  - e. Conditions to maintain the wind speed requirements as described in the "Additional Terms and Conditions" section of this permit.

#### IV. Reporting Requirements (continued)

3. The permittee shall submit an annual report by February 1 of each year for the preceding year to the appropriate Ohio EPA District Office or local air agency. Each annual report shall contain the following:
  - a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10)."
  - b. An estimate of solvent consumption during the reporting period.
4. The permittee shall submit an exceedance report on a semiannual basis to the appropriate Ohio EPA District Office or local air agency as follows:
  - a. if no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters/minute and no correction was made within 15 days of detection; or
  - b. if the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection.

The permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

  - i. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463(e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
  - ii. If no exceedance has occurred, a statement to that effect shall be submitted.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the OC limitation of 25 parts per million. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and conditions of this permit.

#### V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
less than 25 parts per million solvent (OC) (from the exhaust of the carbon adsorber)  
  
Applicable Compliance Method:  
Compliance shall be based upon the monitoring requirements specified in Sections A.III.3 and A.III.4 of this permit.
2. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

## V. Testing Requirements (continued)

- 2.a** Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year).

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- 2.b** Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI$  = the solvent/air interface area (square meters).

$Vol$  = the cleaning capacity of the solvent cleaning machine (cubic meters).

- 2.c** Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at 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:** Metal Parts Washer #1 (K3-1) (L003)

**Activity Description:** Metal parts cold cleaning machine that uses a halogenated non-exempt solvent.

#### 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>
metal parts washer no. 1 (K3-1)	OAC rule 3745-31-05(A) (PTI #03-13456)	408.3 lbs of organic compounds (OC)/month, 2.45 tons of OC/yr (for this emissions unit)
	40 CFR, Part 63, Subpart T	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T. See A.I.2.c and A.I.2.d.
	OAC rule 3745-31-05(D) (PTI #03-13456) OAC rule 3745-21-09(O)	4.25 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.) exempt, pursuant to OAC rule 3745-21-09(O)(6) (See A.I.2.e.)

##### 2. Additional Terms and Conditions

- 2.a For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.b The total OC emissions for emissions units L003 and L004, combined, shall be limited to 4.25 tons of OC per rolling, 12-month summation of the monthly OC emission rates. To ensure compliance with this emission limitation, the permittee shall be limited to a maximum solvent usage, for emissions units L003 and L004, combined, of 697 gallons per rolling, 12-month summation of the monthly solvent usage rates.  
  
 \* Monthly OC input rate = summation [(Ci - Ei) x Di for all cleaning solvents], where Ci = the number of gallons of each cleaning solvent employed per month, Di = the OC content of each cleaning solvent employed in pounds per gallon, and Ei = the number of gallons of each cleaning solvent sent off-site for disposal or reclamation (minus solids content of said material).
- 2.c This emissions unit shall (i) employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and (ii) have a freeboard ratio of 0.75 or greater.

## **2. Additional Terms and Conditions (continued)**

- 2.d** The permittee shall comply with the following work and operational practice requirements:
- i. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
  - ii. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
  - iii. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
  - iv. The permittee shall ensure that the solvent level does not exceed the fill line.
  - v. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition A.I.2.d.i. above.
  - vi. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
  - vii. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
  - viii. Sponges, fabric, wood, and paper products shall not be cleaned.
- 2.e** The exemption allowed in accordance with OAC rule 3745-21-09(O)(6) is not currently part of the federally-approved SIP. During the rulemaking process, Ohio EPA received confirmation from the USEPA concerning the acceptability of this exemption. Therefore, this exemption will be considered to be federally enforceable while SIP approval by USEPA is being obtained.

## **II. Operational Restrictions**

1. The OC content of the solvents employed in this emissions unit shall not exceed 12.20 lbs/gallon.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, type, and identification number of each solvent employed;
  - b. the OC content of each solvent employed, in lbs/gallon;
  - c. the number of gallons of each solvent employed;
  - d. the total OC emission rate for each solvent employed (b x c), in pounds;
  - e. the total OC emission rate for all the solvents employed (summation of d for all solvents), in pounds; and
  - f. the total number of gallons of all the solvents employed (summation of c for all solvents).

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

2. The permittee shall collect and record the following information each month for emissions units L003 and L004, combined:
  - a. the total OC emission rate for all the solvents employed, in tons (summation of 1.e for emissions units L003 and L004, divided by 2000);
  - b. the total OC usage rate for all the solvents employed, in gallons (summation of 1.f for emissions units L003 and L004);
  - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
  - c. the rolling, 12-month summation of the monthly solvent usage rates, in gallons.

Note: the permittee may also calculate solvent usage and OC emission rates in accordance with the following formulas if waste cleaning solvents are sent off site for reclamation/disposal:

solvent usage rate (gallons/month) = (total monthly gallons of cleaning solvent used) - (total monthly gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material])

OC emissions (pounds/month) = (total monthly gallons of cleaning solvent used x solvent density) - (total monthly gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material] x solvent density)

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month OC limitation, for emissions units L003 and L004, combined, of 4.25 tons;
  - b. all exceedances of the rolling, 12-month solvent usage restriction, for emissions units L003 and L004, combined, of 697 gallons; and
  - c. all exceedances of the monthly OC limitation, for this emissions unit, of 408.3 pounds.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. This emissions unit is considered an existing solvent-cleaning machine per 40 CFR 63.461 because the construction commenced before November 29, 1993. Therefore, the permittee shall comply with the following reporting requirements in accordance with 40 CFR 63.468(a) and 40 CFR 63.468(c):
  - 2.a The permittee shall submit an initial notification report to the Administrator of the U.S. EPA no later than August 29, 1995. This report shall include the following information:
    - i. The name and address of the permittee.
    - ii. The address (i.e., physical location) of the solvent cleaning machine.
    - iii. A brief description of each solvent cleaning machine type (batch cold), solvent/air interface area, and existing controls.
    - iv. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
    - v. The anticipated compliance approach for each solvent cleaning machine.
    - vi. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

#### **IV. Reporting Requirements (continued)**

- 2.b** The permittee shall submit a compliance report to the Administrator of the U.S. EPA no later than 150 days after December 2, 1997. This report shall include the following information:
- i. The name and address of the permittee.
  - ii. The address (i.e., physical location) of the solvent cleaning machine.
  - iii. A statement, signed by the permittee of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
  - iv. The compliance approach for each solvent cleaning machine.
- 3.** 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.

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

- 1.** Compliance with the emissions limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- 1.a** Emission Limitation:  
408.3 lbs of OC/month (for this emissions unit)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
- 1.b** Emission Limitation:  
2.45 tons of OC/yr (for this emissions unit)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.
- 1.c** Emission Limitation:  
4.25 tons of OC/rolling, 12-month period (for emissions units L003 and L004, combined)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.
- 1.d** Emission Limitation:  
697 gallons per rolling, 12-month summation of the monthly solvent usage rates (for emissions units L003 and L004, combined)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.
- 2.** The permittee shall comply with the following testing requirements in accordance with 40 CFR 63.465(e):
- The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

## V. Testing Requirements (continued)

- 2.a** Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year).

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year) = 8,760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour) = 1.95 kilograms per square meter per hour for cold cleaning machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in condition A.V.2.b below.

- 2.b** Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI$  = the solvent/air interface area (square meters).

$Vol$  = the cleaning capacity of the solvent cleaning machine (cubic meters).

- 2.c** Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at 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:** Metal Parts Washer #2 (K3-2) (L004)

**Activity Description:** Metal parts cold cleaning machine that uses a halogenated non-exempt solvent.

#### 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>
metal parts washer no. 2 (K3-2)	OAC rule 3745-31-05(A) (PTI #03-13456)	408.3 lbs of organic compounds (OC)/month, 2.45 tons of OC/yr (for this emissions unit)
	40 CFR, Part 63, Subpart T	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart T and OAC rule 3745-31-05(D). See A.I.2.c and A.I.2.d.
	OAC rule 3745-31-05(D) (PTI #03-13456)	4.25 tons of OC/rolling, 12-month period (See A.I.2.a and A.I.2.b.)
	OAC rule 3745-21-09(O)	exempt, pursuant to OAC rule 3745-21-09(O)(6) (See A.I.2.e.)

##### 2. Additional Terms and Conditions

- For purposes of federal enforceability, all OCs are considered to be VOCs.
- The total OC emissions for emissions units L003 and L004, combined, shall be limited to 4.25 tons of OC per rolling, 12-month summation of the monthly OC emission rates. To ensure compliance with this emission limitation, the permittee shall be limited to a maximum solvent usage, for emissions units L003 and L004, combined, of 697 gallons per rolling, 12-month summation of the monthly solvent usage rates.
 

\* Monthly OC input rate = summation [(Ci - Ei) x Di for all cleaning solvents], where Ci = the number of gallons of each cleaning solvent employed per month, Di = the OC content of each cleaning solvent employed in pounds per gallon, and Ei = the number of gallons of each cleaning solvent sent off-site for disposal or reclamation (minus solids content of said material).
- This emissions unit shall (i) employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and (ii) have a freeboard ratio of 0.75 or greater.

## **2. Additional Terms and Conditions (continued)**

- 2.d** The permittee shall comply with the following work and operational practice requirements:
- i. All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
  - ii. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
  - iii. The permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
  - iv. The permittee shall ensure that the solvent level does not exceed the fill line.
  - v. Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition A.1.2.d.i. above.
  - vi. When an air- or pump-agitated solvent bath is used, the permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent, but not observable splashing against tank walls or parts being cleaned.
  - vii. The permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
  - viii. Sponges, fabric, wood, and paper products shall not be cleaned.
- 2.e** The exemption allowed in accordance with OAC rule 3745-21-09(O)(6) is not currently part of the federally-approved SIP. During the rulemaking process, Ohio EPA received confirmation from the USEPA concerning the acceptability of this exemption. Therefore, this exemption will be considered to be federally enforceable while SIP approval by USEPA is being obtained.

## **II. Operational Restrictions**

1. The OC content of the solvents employed in this emissions unit shall not exceed 12.20 lbs/gallon.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name, type, and identification number of each solvent employed;
  - b. the OC content of each solvent employed, in lbs/gallon;
  - c. the number of gallons of each solvent employed;
  - d. the total OC emission rate for each solvent employed (b x c), in pounds;
  - e. the total OC emission rate for all the solvents employed (summation of d for all solvents), in pounds; and
  - f. the total number of gallons of all the solvents employed (summation of c for all solvents).

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

2. The permittee shall collect and record the following information each month for emissions units L003 and L004, combined:
  - a. the total OC emission rate for all the solvents employed, in tons (summation of 1.e for emissions units L003 and L004, divided by 2000);
  - b. the total OC usage rate for all the solvents employed, in gallons (summation of 1.f for emissions units L003 and L004);
  - c. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
  - c. the rolling, 12-month summation of the monthly solvent usage rates, in gallons.

Note: the permittee may also calculate solvent usage and OC emission rates in accordance with the following formulas if waste cleaning solvents are sent off site for reclamation/disposal:

solvent usage rate (gallons/month) = (total monthly gallons of cleaning solvent used) - (total monthly gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material])

OC emissions (pounds/month) = (total monthly gallons of cleaning solvent used x solvent density) - (total monthly gallons of cleaning solvent sent off-site for disposal or reclamation [minus solids content of said material] x solvent density)

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month OC limitation, for emissions units L003 and L004, combined, of 4.25 tons;
  - b. all exceedances of the rolling, 12-month solvent usage restriction, for emissions units L003 and L004, combined, of 697 gallons; and
  - c. all exceedances of the monthly OC limitation, for this emissions unit, of 408.3 pounds.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. This emissions unit is considered an existing solvent-cleaning machine per 40 CFR 63.461 because the construction commenced before November 29, 1993. Therefore, the permittee shall comply with the following reporting requirements in accordance with 40 CFR 63.468(a) and 40 CFR 63.468(c):
  - 2.a The permittee shall submit an initial notification report to the Administrator of the U.S. EPA no later than August 29, 1995. This report shall include the following information:
    - i. The name and address of the permittee.
    - ii. The address (i.e., physical location) of the solvent cleaning machine.
    - iii. A brief description of each solvent cleaning machine type (batch cold), solvent/air interface area, and existing controls.
    - iv. The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
    - v. The anticipated compliance approach for each solvent cleaning machine.
    - vi. An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

#### **IV. Reporting Requirements (continued)**

- 2.b** The permittee shall submit a compliance report to the Administrator of the U.S. EPA no later than 150 days after December 2, 1997. This report shall include the following information:
- i. The name and address of the permittee.
  - ii. The address (i.e., physical location) of the solvent cleaning machine.
  - iii. A statement, signed by the permittee of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
  - iv. The compliance approach for each solvent cleaning machine.
- 3.** 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.

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

- 1.** Compliance with the emissions limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- 1.a** Emission Limitation:  
408.3 lbs of OC/month (for this emissions unit)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
- 1.b** Emission Limitation:  
2.45 tons of OC/yr (for this emissions unit)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.
- 1.c** Emission Limitation:  
4.25 tons of OC/rolling, 12-month period (for emissions units L003 and L004, combined)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.
- 1.d** Emission Limitation:  
697 gallons per rolling, 12-month summation of the monthly solvent usage rates (for emissions units L003 and L004, combined)
- Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.
- 2.** The permittee shall comply with the following testing requirements in accordance with 40 CFR 63.465(e):
- The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

## V. Testing Requirements (continued)

- 2.a** Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year).

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year) = 8,760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour) = 1.95 kilograms per square meter per hour for cold cleaning machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in condition A.V.2.b below.

- 2.b** Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 * (Vol)^{0.6}$$

Where:

$SAI$  = the solvent/air interface area (square meters).

$Vol$  = the cleaning capacity of the solvent cleaning machine (cubic meters).

- 2.c** Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at 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:** BB240 Banbury Mixer #1 (S17-1) (P037)

**Activity Description:** Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.

**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>
BB240 Banbury mixer (S17-1), with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-31-05(A) (PTI #03-5384)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). 0.28 lb/hr of PE
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G)(2).  See A.II.2. 8.0 lbs of organic compounds (OC)/hr and 40.0 lbs of OC/day

**2. Additional Terms and Conditions**

- 2.a The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b The 0.28 lb of PE/hr and 8.0 lbs of OC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.
2. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification for each rubber compound employed;
  - b. the number of pounds of rubber compounds processed;
  - c. the total organic compound emission rate for all the rubber compounds processed, in pounds, calculated as follows:

$$\text{OC (lbs/day)} = [b \times E]$$

where:

b = weight of rubber compounds processed, in lbs/day

E = 0.000153 = emission factor (lb OC/lb of product processed)\*

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project," September 1996, for internal mixing and milling, compound No. 13.

3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each cleanup material employed in this emissions unit; and
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1. of the terms and conditions of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. An identification of each day during which the organic compound emissions from the rubber compounds exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying cleanup material (i.e., photochemically reactive cleanup material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with the methods in OAC rule 3745-17-03(B)(1).

## V. Testing Requirements (continued)

- 1.b** Emission limitation:  
0.28 lb of PE/hr

Applicable compliance method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (2,682 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)\*

C = operating control efficiency of the baghouse (99.0 percent)

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

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

- 1.c** Emission Limitations:  
8.0 lbs of OC/hr and 40.0 lbs of OC/day

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by using the following formula:

$$OC \text{ (lbs/hr)} = [P \times E]$$

where:

P = maximum process weight rate, in lbs/hr (2,682 lbs/hr)

E = 0.000153 = emission factor (lb OC/lb of product processed)\*

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 13.

The permittee may determine compliance with the daily allowable OC emission limitation based on the record keeping requirements in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with 40 CFR 60, Appendix A, Methods 18, 25 or 25A, as applicable.

## VI. Miscellaneous Requirements

1. This emissions unit is operating in violation of the PE limitation established in PTI #03-5384. [This was as a result of the updated emission factors, based upon the Rubber Manufacturers Association (RMA) "Emission Factors Development Project," for PE.] As an initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

**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:** Hose Marking Machine #1 (H70) (P043)

**Activity Description:** Ink Printing Operation For EFI Rubber Hose Using Transfer Head Process.

#### 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>
hose marking machine (H70)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.30 lb of organic compounds (OC)/hr, 1.31 tons of OC/yr (from the use of coatings)  69.8 lbs of OC/month, 0.35 ton of OC/rolling, 12-month period (from the use of cleanup materials)
	OAC rule 3745-21-07(G)(2)	See A.I.2.b. and A.II.1. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The 0.30 lb/hr and 1.31 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The permittee shall not employ cleanup materials in this emissions unit at an input rate that would exceed 0.35 ton of OC per rolling, 12-month summation of the monthly OC input rates.

##### II. Operational Restrictions

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

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

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of each cleanup material, as applied;
  - b. documentation on whether or not each cleanup material is a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material employed, in lbs/gallon;
  - e. the total OC input rate for each cleanup material employed (c x d), in pounds; and
  - f. the total OC rate for all the cleanup materials employed (summation of e for all cleanup materials), in pounds; and
  - g. the rolling, 12-month summation of the monthly OC input rates, in tons.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following (for cleanup materials usage):
  - a. all exceedances of the of the monthly OC input rate of 69.8 pounds; and
  - b. all exceedances of the rolling, 12-month OC input rate limitation of 0.35 ton.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions.

2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit (from cleanup materials usage) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying cleanup material (i.e., photochemically reactive cleanup material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

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

- 1.a Emission Limitations:  
0.30 lb of OC/hr, 1.31 tons of OC/yr (for coatings usage)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable emission limitation by multiplying the maximum coatings usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.b Emission Limitations:  
69.8 lbs of OC/month; 0.35 ton of OC/rolling, 12-month period (for cleanup materials usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

**V. Testing Requirements (continued)**

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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:** Glycol Dip Tank No.1 w/(2) Steam Cleaning Systems(B309) (P046)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 1, with 2 steam clean systems (B309)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.2 w/(2) Steam Cleaning Systems(B329) (P047)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 2, with 2 steam clean systems (B329)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

- 1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

- 1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank w/ (1) Steam Cleaning System (B195) (P048)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank, with 1 steam clean system (B195)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.3 w/(1) Steam Cleaning System (B462) (P049)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 3, with 1 steam clean system (B462)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.4 w/(1) Steam Cleaning System (B464) (P050)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 4, with 1 steam clean system (B464)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- For purposes of federal enforceability, all OCs are considered to be VOCs.
- The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

- The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
- The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.5 w/(1) Steam Cleaning System (B486) (P051)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 5, with 1 steam clean system (B486)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.6 w/(1) Steam Cleaning System (B505) (P052)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 6, with 1 steam clean system (B505)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Glycol Dip Tank No.7 w/(1) Steam Cleaning System (B507) (P053)  
**Activity Description:** Steam Cleaning Operation For Automotive Part Manufacturing Which Has Ethylene Glycol Emissions.

#### 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>
glycol dip tank no. 7, with 1 steam clean system (B507)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.80 lb of organic compounds (OC)/hr, 3.50 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-10256)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.80 lb of OC/hr and 3.50 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.80 lb of OC/hr, 3.50 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Restriction:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Joint Assembly Machine No.1 (A55)[Rubber Hose Cleaning] (P057)  
**Activity Description:** Cleaning Operation Using M & M Thinner

#### 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>
joint assembly rubber hose cleaning machine no. 1 (A55)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.36 lb of organic compounds (OC)/hr, 1.58 tons of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

- 2.a The 0.36 lb of OC/hr and 1.58 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.

##### II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of each material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

##### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:  
0.36 lb of OC/hr

Applicable Compliance Method:

The permittee shall determine compliance by multiplying the hourly maximum liquid organic materials usage rate (gallons/hr) by the maximum OC content of all of the liquid organic materials (lbs/gallon).

**1.b** Emission Limitation:  
1.58 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

## **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>
joint assembly rubber hose cleaning machine no. 1 (A55)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permit to install for this emissions unit was evaluated based on the actual materials (hose cleaning and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: ethyl benzene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,353  
 MAGLC (ug/m3): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials were assumed to be ethyl benzene which has the lowest TLV of the remaining compounds.

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

3. 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:
- changes in the composition of the materials used (hose cleaning or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - 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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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:** Joint Assembly Machine No.2 (A56)[Rubber Hose Cleaning] (P058)  
**Activity Description:** Cleaning Operation Using M & M Thinner

#### 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>
joint assembly rubber hose cleaning machine no. 2 (A56)	OAC rule 3745-31-05(A) (PTI #03-10256)	0.30 lb of organic compounds (OC)/hr, 1.31 tons of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

- 2.a The 0.30 lb of OC/hr and 1.31 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.

##### II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of each material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

##### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:  
0.30 lb of OC/hr

Applicable Compliance Method:

The permittee shall determine compliance by multiplying the hourly maximum liquid organic materials usage rate (gallons/hr) by the maximum OC content of all of the liquid organic materials (lbs/gallon).

**1.b** Emission Limitation:  
1.31 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

## **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>
joint assembly rubber hose cleaning machine no. 2 (A56)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-10256 modification issued on November 2, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (hose cleaning and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: ethyl benzene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 4.18\*  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,353  
 MAGLC (ug/m3): 10,333

\* represents the combined maximum emission rate for K004, K009, K016, K017, K018, K025, K030, K031, K032, K033, K034, P057 and P058

The remaining emissions of toxic compounds, excluding methyl isobutyl ketone, tetrachloroethylene, toluene and xylene in coatings or cleanup materials were assumed to be ethyl benzene which has the lowest TLV of the remaining compounds.

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

3. 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:
- changes in the composition of the materials used (hose cleaning or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - 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.

4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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:** Submerged Assembling Machine (B552) (P059)  
**Activity Description:** Glycol dip tank with (1) steam cleaning system.

#### 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>
glycol dip tank, with 1 steam clean system B552(submerged assembling machine no. 8)	OAC rule 3745-31-05(A) (PTI #03-13411)	0.42 lb of organic compounds (OC)/hr, 1.84 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-13411)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- 2.a The 0.42 lb of OC/hr and 1.84 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

1. The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.42 lb of OC/hr, 1.84 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Limitation:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Submerged Assembling Machine (B596) (P060)  
**Activity Description:** Glycol dip tank with (1) steam cleaning system.

#### 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>
glycol dip tank, with 1 steam clean system (B596)(submerged assembling machine no. 9)	OAC rule 3745-31-05(A) (PTI #03-13411)	0.42 lb of organic compounds (OC)/hr, 1.84 tons of OC/yr (for this emissions unit)
	OAC rule 3745-31-05(D) (PTI #03-13411)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D). 15.6 tons of OC/rolling, 12-month period (See A.I.2.c.)
	OAC rule 3745-21-07(G)	none (See A.II.2.)

##### 2. Additional Terms and Conditions

- The 0.42 lb of OC/hr and 1.84 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- For purposes of federal enforceability, all OCs are considered to be VOCs.
- The permittee has requested the following federally enforceable limitation for purposes of maintaining the facility's status as a minor source for PSD purposes:

The OC emissions for the anti-vibration glycol dipping process operations (emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) shall not exceed 15.6 tons of OC per rolling, 12-month period.

##### II. Operational Restrictions

- The maximum annual production of liquid filled engine mounts for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined, shall not exceed 4,333,333 units per year, based upon a rolling, 12-month summation of the monthly production rates for the emissions units.
- The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each month for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined:
  - a. the production rate (the total number of units produced);
  - b. the calculated OC emission rate, in tons, using the following equation:  
OC emission rate (tons/month) = (the total number of units produced) x (0.0072 lb OC/unit produced)\*
  - c. the rolling, 12-month summation of the monthly production rates; and
  - d. the rolling, 12-month summation of the monthly OC emission rates, in tons.

\* based on the results of emission testing conducted by the permittee for this and similar emissions units
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each material employed in this emissions unit; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month production limitation of 4,333,333 units (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined); and
  - b. all exceedance of the rolling, 12-month OC limitation of 15.6 tons (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined).

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the total OC emissions (from emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined) for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

### V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitations:  
0.42 lb of OC/hr, 1.84 tons of OC/yr

Applicable Compliance Method:  
Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum hourly production rate (maximum number of units/hr) by an emission factor of 0.0072 lb of OC/unit produced.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:  
15.6 tons of OC per rolling, 12-month period (for emissions units P046, P047, P048, P049, P050, P051, P052, P053, P059, P060 and P066, combined)

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**1.c** Production Limitation:  
Maximum annual production of 4,333,333 liquid filled engine mounts per year

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

**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:** Joint Assembly Machine (A60) (P061)

**Activity Description:** MEK and Methanol blend is used as a cleaning and insertion agent for rubber hose and metal joint

#### 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>
joint hose assembly machine no. 3 (A60)	OAC rule 3745-31-05(A) (PTI #03-13411)	0.30 lb of organic compounds (OC)/hr, 1.31 tons of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

- 2.a The 0.30 lb of OC/hr and 1.31 TPY OC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.

##### II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and maintain monthly records of the following information for this emissions unit:
  - a. the name and identification number of each material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

##### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying liquid organic material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:  
0.30 lb of OC/hr

Applicable Compliance Method:

The permittee shall determine compliance by multiplying the hourly maximum liquid organic materials usage rate (gallons/hr) by the maximum OC content of all of the liquid organic materials (lbs/gallon).

**1.b** Emission Limitation:  
1.31 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

## **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>
joint hose assembly machine no. 3 (A60)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13411 issued on July 18, 2000: B.III.2, B.III.3 and B.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit was evaluated based on the actual materials (hose cleaning and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: methanol  
 TLV (mg/m3): 262  
 Maximum Hourly Emission Rate (lbs/hr): 0.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 253.8  
 MAGLC (ug/m3): 6,238

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

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

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

4. 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:** Banbury Mixer #2 (S040) (P064)

**Activity Description:** Rubber Compound Mixer: Particulate Air Emission Sources controlled by a Baghouse.

#### 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>
banbury mixer no. 2 (S040), with baghouse	OAC rule 3745-31-05(A) (PTI #03-3085)	0.58 lb/hr of particulate emissions (PE), 2.54 tons of PE/yr  0.65 lb/hr of organic compounds (OC), 2.85 tons of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The 0.58 lb of PE/hr, 2.54 tons of PE/yr, 0.65 lb of OC/hr and 2.85 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

##### II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically" reactive material is defined in OAC rule 3745-21-01(C)(5).

## II. Operational Restrictions (continued)

2. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

## IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying cleanup material (i.e., photochemically reactive cleanup material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

## V. Testing Requirements

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

- 1.a Emission Limitation:  
0.58 lb of PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)\*

C = operating control efficiency of the baghouse (99.0 percent)

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

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

## V. Testing Requirements (continued)

- 1.b** Emission Limitation:  
2.54 tons of PE/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:  
0.65 lb of OC/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by using the following formula:

$$\text{OC (lbs/hr)} = [P \times E]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.000153 = emission factor (lb OC/lb of product processed)\*

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 13.

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with 40 CFR 60, Appendix A, Methods 18, 25 or 25A, as applicable.

- 1.d** Emission Limitation:  
2.85 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.e** Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

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

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** Roll Mill #2 (S047) (P065)

**Activity Description:** Rubber Milling Machine: Particulate Air Emission Sources controlled by a Baghouse.

#### 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>
roll mill no. 2 (S047)	OAC rule 3745-31-05(A) (PTI #03-3085)	0.58 lb/hr of particulate emissions (PE), 2.54 tons of PE/yr  0.65 lb/hr of organic compounds (OC), 2.85 tons of OC/yr  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ a baghouse to control all the PE from this emissions unit.
- 2.b For purposes of federal enforceability, all OCs are considered to be VOCs.
- 2.c The 0.58 lb of PE/hr, 2.54 tons of PE/yr, 0.65 lb of OC/hr and 2.85 tons of OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

##### II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically" reactive material is defined in OAC rule 3745-21-01(C)(5).

## II. Operational Restrictions (continued)

2. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

## IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying cleanup material (i.e., photochemically reactive cleanup material) in this emissions unit. The notification shall include a copy of such records and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

## V. Testing Requirements

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

- 1.a Emission Limitation:  
0.58 lb of PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by using the following formula:

$$PE \text{ (lbs/hr)} = [P \times E \times (1 - C)]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.0136 = emission factor (lb PE/lb of product processed)\*

C = operating control efficiency of the baghouse (99.0 percent)

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 5.

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

## V. Testing Requirements (continued)

- 1.b** Emission Limitation:  
2.54 tons of PE/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:  
0.65 lb of OC/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by using the following formula:

$$\text{OC (lbs/hr)} = [P \times E]$$

where:

P = maximum process weight rate, in lbs/hr (4,250 lbs/hr)

E = 0.000153 = emission factor (lb OC/lb of product processed)\*

\* The emission factor is from the Rubber Manufacturers Association "Emission Factors Development Project", September 1996, for internal mixing and milling, compound No. 13.

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with 40 CFR 60, Appendix A, Methods 18, 25 or 25A, as applicable.

- 1.d** Emission Limitation:  
2.85 tons of OC/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- 1.e** Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

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

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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