State of Ohio Environmental Protection Agency

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

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

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

03/23/01

**CERTIFIED MAIL**

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

03-22-02-0042
Visteon Sandusky Plastic Plant
Richard H. Frasca
3020 Tiffin Avenue
Sandusky, OH 44870-0000

Dear Richard H. Frasca:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 03/04/99. 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

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

cc: Northwest District Office
Becky Castle, DAPC PMU

**Ohio EPA**
State of Ohio Environmental Protection Agency

# PRELIMINARY PROPOSED TITLE V PERMIT

Date: 03/23/01
Effective Date: **To be entered upon final issuance**
Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Visteon Sandusky Plastic Plant
3020 Tiffin Avenue
Sandusky, OH 44870-0000

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

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

P056 (Thermal Cure Oven)
Thermal cure oven associated with flowcoater booths

R022 (DECO paint booth)
DECO paint booth #2

R027 (UV Cure Hardcoat)
UV Cure Hardcoat system spray booth

R038 (DECO up-spray )
DECO spray booth #3

R050 (UV Clearcoat)
UV Clearcoat/Hardcoat spray booth system #2 for plastic parts

R051 (UV Clearcoat)
UV Clearcoat/Hardcoat spray booth system #3 for plastic parts

R052 (Basecoat spray)
DN-101 Second surface decorating: Basecoat spray booth for plastic parts

R053 (Topcoat spray)
DN-101 Second surface decorating: Topcoat spray booth for plastic parts

R054 (Flowcoater)
Thermal cure flowcoater to clearcoat plastic parts

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

Christopher Jones
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

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

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring, recordkeeping, and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

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

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

**2. Scheduled Maintenance/Malfunction Reporting**

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

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

**3. Risk Management Plans**

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

**4. Title IV Provisions**

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

**5. Severability Clause**

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

**6. General Requirements**

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

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

**8. Marketable Permit Programs**

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

**9. Reasonably Anticipated Operating Scenarios**

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

**10. Reopening for Cause**

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than

the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

**11. Federal and State Enforceability**

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

**12. Compliance Requirements**

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement.

Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## 13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

## 14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed

therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

**15. Emergencies**

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

**16. Off Permit Changes**

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

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

## 17. Compliance Method Requirements

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

## 18. Insignificant Activity

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

## B. State Only Enforceable Section

### 1. Permit to Install Requirement

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

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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

### 3. Records Retention Requirements

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

### 4. Inspections and Information Requests

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

## 6. Permit Transfers

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

## 7. Air Pollution Nuisance

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

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

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

# Part II - Specific Facility Terms and Conditions

## A. State and Federally Enforceable Section

**None**

## B. State Only Enforceable Section

**1.** The following insignificant emissions units are located at this facility:
9.75 mmBtu/hour boiler (B005); 9.75 mmBtu/hour boiler (B006); 9.75 mmBtu/hour boiler (B007); 9.75 mmBtu/hour boiler (B008); 9.75 mmBtu/hour boiler (B009); 9.75 mmBtu/hour boiler (B010); 9.75 mmBtu/hour boiler (B011); 9.75 mmBtu/hour boiler (B012); 9.75 mmBtu/hour boiler (B013); 9.75 mmBtu/hour boiler (B014); 9.75 mmBtu/hour boiler (B015); 9.75 mmBtu/hour boiler (B016); 9.75 mmBtu/hour boiler (B017); 9.75 mmBtu/hour boiler (B018); 9.75 mmBtu/hour boiler (B019); 9.75 mmBtu/hour boiler (B020); 1.25 mmBtu/hour boiler (B021); 1.25 mmBtu/hour boiler (B022); 1.25 mmBtu/hour boiler (B023); 2.25 mmBtu/hour boiler (B024); 5.75 mmBtu/hour boiler (B025); 9.25 mmBtu/hour boiler (B026); 3.00 mmBtu/hour boiler (B027); 4.5 mmBtu/hour boiler (B028); diesel fuel and gasoline storage tanks/dispensing facility (G001); pyrolysis cleaning oven (N001); carbon canister (P051); ASEA urethane (P052); ASEA urethane (P053); ASEA urethane (P054); ASEA adhesive (R028); ASEA adhesive (R029); ASEA adhesive (R030); ASEA adhesive (R031); ASEA adhesive (R032); ASEA adhesive (R033); ASEA adhesive (R034); ASEA adhesive (R035); ASEA adhesive (R036); ASEA adhesive (R037); ASEA adhesive (R039); ASEA adhesive (R040); ASEA adhesive (R042); ASEA adhesive (R043); ASEA adhesive (R044), ASEA adhesive (R045), ASEA adhesive (R046); ASEA adhesive (R047); ASEA adhesive (R055); ASEA adhesive (R056); hand sealant application (Z001); paint kitchen (Z002); hot butyl sealant application (Z003); carbon cannister (Z004); maintenance parts cleaners (Z005); and diesel-fired water pumps (Z006).

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

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** 77mmbtu gas/oil (B004)

**Activity Description:** Natural Gas/Oil Fired Boiler (77mmbtu gas/oil)

## A. State and Federally Enforceable Section

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

**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.

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

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The quality of oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs of sulfur dioxide/mmBtu of actual heat input.

**2.** The permittee shall burn only natural gas and/or number 2 fuel oil in this emissions unit.

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

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

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

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

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

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 of this permit. 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 deviation occurs.

**2.** The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## V. Testing Requirements

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

**1.a** Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
When firing natural gas, the permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

When firing number two fuel oil, and/or a combination of number two fuel oil and natural gas, the permittee may determine compliance by multiplying the maximum hourly fuel oil consumption rate (gallons/hr) by the emission factor from AP-42, Table 1.3-1 (revised 9/98) of 2.0 lbs PE (filterable)/1000 gallons of oil used, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

**1.b** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

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

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

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

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

If required, compliance with the limitation above shall be determined in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

## 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.

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

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Thermal Cure Oven (P056)

**Activity Description:** Thermal cure oven associated with flowcoater booths

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| thermal cure oven associated with dual coating spray booth (emissions unit R054) | OAC rule 3745-21-07(G)(1) | 3.0 pounds/hr and 15.0 pounds/day of organic compounds (OC) |
| | OAC rule 3745-31-05<br>PTI No. 03-9956 | See section A.I.2.a of the terms and conditions of this permit.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). |

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

**None**

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

**1.** The permittee shall collect and record the following information for each day for emissions units R022, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040, R042, R043, R044, R045, R046, R047, R050, R051, R052, R053, R054, P052, P053 and P054, combined:

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. The total potential (prior to applying the booth/oven "split") uncontrolled daily organic compound emission rate for all coatings employed in the coating operation associated with this emissions unit (R054), multiplied by the maximum percentage of the emissions associated with this emissions unit as defined below (see section A.III.3), in pounds.

b. The total number of hours this emissions unit was in operation. (This number should be the same as the number of hours the associated coating operation was in operation.)

c. The average hourly organic compound emission rate, i.e., a/b, in pounds per hour (average).

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. an identification of each day during which the average hourly organic compound emissions exceeded 3 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

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

## V. Testing Requirements

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

**1.a** Emission Limitation: 235.6 tons OC/year, based upon a rolling, 365-day summation of the daily OC emission rates

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

**1.b** Emission Limitation:
3.0 pounds/hour OC
15.0 pounds/day OC

Applicable Compliance Method:
Compliance with the hourly limitation shall be based on the results of the emission testing conducted in accordance with Methods 25 or 25A of 40 CFR, Part 60, Appendix A and the record keeping requirements specified in section A.III.1 of this permit.

Compliance with the daily limitation shall be based upon the record keeping requirements specified in section A.III .1of the terms and conditions of this permit.

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

**3.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months of issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable OC emission limitation of 3 lbs/hr.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 25 or 25A, as applicable, which are located in 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

An OC emissions test also shall be conducted on emissions unit R054 to determine oven/booth split as defined in section A.III.2 of this permit.

## V. Testing Requirements (continued)

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| thermal cure oven associated with dual coating spray booth (emissions unit R054) | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

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

**1.** The permit to install for this emissions unit was evaluated based on the actual 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 (or other Ohio EPA approved 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(s):

Pollutant: diacetone alcohol*

TLV (ug/m3): 238,000

Maximum Hourly Emission Rate (lbs/hr): 3

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

MAGLC (ug/m3): 5,667

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

## 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 still 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 (typically 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:** DECO paint booth (R022)

**Activity Description:** DECO paint booth #2

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DECO coating operation #2 for plastic parts | OAC rule 3745-21-07(G)(2) | 8.0 pounds/hr and 40 pounds/day of organic compounds (OC) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit.<br><br>See section A.II.1.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

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

a. the company identification for each coating and cleanup material employed;

b. the determination of whether or not each cleanup material is a photochemically reactive material;

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon, as applied*;

e. the OC emission rate for each coating employed, in pounds [c X d];

f. the total OC emission rate for all coatings employed, in pounds [summation of e for all coatings];

g. the total number of hours the emissions unit was in operation; and

h. the average hourly OC emission rate for all coatings, in pounds/hour (average) [f/g].

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) cleanup material was employed in this emissions unit.

**3.** The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

**4.** The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a** Emission Limitation: 235.6 tons OC/year, based upon a rolling, 365-day summation of the daily OC emission rates

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

**1.b** Emission Limitation:
8.0 pounds/hour OC
40.0 pounds/day OC

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DECO coating operation #2 for plastic parts | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

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

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** UV Cure Hardcoat (R027)

**Activity Description:** UV Cure Hardcoat system spray booth

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| UV cure hardcoat coating operation for plastic parts | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. the company identification of each coating and/or cleanup material employed; and

b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

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

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

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

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

Emission Limitation: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** DECO up-spray (R038)

**Activity Description:** DECO spray booth #3

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DECO coating operation #3 for plastic parts | OAC rule 3745-21-07(G)(2) | 8.0 pounds/hr and 40 pounds/day of organic compounds (OC) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit.<br><br>See section A.II.1.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

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

a. the company identification for each coating and cleanup material employed;

b. the determination of whether or not each cleanup material is a photochemically reactive material;

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon, as applied*;

e. the OC emission rate for each coating employed, in pounds [c X d];

f. the total OC emission rate for all coatings employed, in pounds [summation of e for all coatings];

g. the total number of hours the emissions unit was in operation; and

h. the average hourly OC emission rate for all coatings, in pounds/hour (average) [f/g].

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) cleanup material was employed in this emissions unit.

**3.** The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

**4.** The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a** Emission Limitation: 235.6 tons OC/year, based upon a rolling, 365-day summation of the daily OC emission rates

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

**1.b** Emission Limitations:
8.0 pounds/hour OC
40.0 pounds/day OC

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of the terms and conditions of this permit.

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DECO coating operation #3 for plastic parts | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

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

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** UV Clearcoat (R050)

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

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| UV clear coat/hard coat spray booth system # 2 for for plastic parts | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. the company identification of each coating and/or cleanup material employed; and

b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

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

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

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

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

Emission Limitation: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** UV Clearcoat (R051)

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

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| UV clear coat/hard coat spray booth system # 3 for for plastic parts | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. the company identification of each coating and/or cleanup material employed; and

b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

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

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

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

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

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

Emission Limitation: 37.5 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Basecoat spray (R052)

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

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DN-101 second surface decorating: basecoat spray booth for plastic part | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. the company identification of each coating and/or cleanup material employed; and

b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DN-101 second surface decorating: basecoat spray booth for plastic part | OAC rule 3745-31-05<br>PTI No. 03-9956 | 30 pounds OC/hr (see A.I.2.a).<br><br>0.13 pound particulate emissions (PE)/hr |

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

**1.** The permit to install for this emissions unit was evaluated based on the actual 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 (or other Ohio EPA approved 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(s):

Pollutant: propylene glycol monmethyl ether*

TLV (ug/m3): 369,000

Maximum Hourly Emission Rate (lbs/hr): 30

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

MAGLC (ug/m3): 8,786

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

**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 still 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 (typically 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.

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

**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

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

**1.a** Emission Limitation: 30 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

**1.b** Emission Limitation -
0.13 lb/hour PE

Applicable Compliance Method -
To determine the actual worst case emissions rate for particulates, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = particulates rate (lbs/hour)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

## VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Topcoat spray (R053)

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

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DN-101 second surface decorating: topcoat spray booth for plastic parts | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.c of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

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

**2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.c** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

a. the company identification of each coating and/or cleanup material employed; and

b. the determination of whether or not each coating and/or cleanup material is a photochemically reactive material.

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating and/or cleanup material was employed in this emissions unit.

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

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| DN-101 second surface decorating: topcoat spray booth for plastic parts | OAC rule 3745-31-05<br>PTI No. 03-9956 | 30 pounds OC/hr (see A.I.2.a).<br><br>0.52 pounds particulate emissions (PE)/hr |

**2. Additional Terms and Conditions**

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

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

### II. Operational Restrictions

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

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

**1.** The permit to install for this emissions unit was evaluated based on the actual 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 (or other Ohio EPA approved 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(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 30

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

MAGLC (ug/m3): 4,476

## 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 still 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 (typically 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

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

**1.a** Emission Limitation: 30 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

## V. Testing Requirements (continued)

**1.b** Emission Limitation -
0.52 lb/hour PE

Applicable Compliance Method -
To determine the actual worst case emissions rate for particulates, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = particulates rate (lbs/hour)

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

## VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Flowcoater (R054)

**Activity Description:** Thermal cure flowcoater to clearcoat plastic parts

## A. State and Federally Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| thermal cure flowcoater to clearcoat plastic parts | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |
| | OAC rule 3745-31-05 (PTI No. 03-9956) | Refer to section A.I.2.a of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

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

### II. Operational Restrictions

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

**1.a** For all coatings employed:

i. the company identification of each coating employed;

ii. the quantity of each coating employed, in gallons;

iii. the OC content of each coating employed, in pounds/gallon;

iv. the OC emissions for each coating employed, in pounds [the product of 1.a.ii and 1.a.iii]; and

v. the total OC emissions for all coatings employed, in pounds [summation of 1.a.iv for all coatings].

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

**1.b** For all cleanup materials employed :

i. the company identification of each cleanup material* employed;

ii. the quantity of each cleanup material employed, in gallons;

iii. the OC content of each cleanup material employed, in pounds/gallon;

iv. the OC emissions for each cleanup material employed, in pounds [product of 1.b.ii and 1.b.iii]; and

v. the total OC emissions for all cleanup materials employed, in pounds [summation of 1.b.iv for all cleanup materials].

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

**1.c** For all coatings and cleanup materials employed:

i. the total OC emissions for all coatings and cleanup materials employed, in tons [sum of 1.a.v and 1.b.v]; and

ii. the total OC emissions (tons)/rolling, 365-day period, calculated as follows:

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

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

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

b. The number of gallons of each coating employed.

c. The organic compound content of each coating, in pounds per gallon.

d. The total potential (prior to applying the booth/oven "split") organic compound emission rate for all coatings, in pounds.

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

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day OC emission limitation of 235.6 tons.

**2.** The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a noncomplying (i.e., photochemically reactive) coating or cleanup material was employed in this emissions unit.

## IV. Reporting Requirements (continued)

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

Emission Limitation: 235.6 tons OC/year, based upon a rolling, 365-day summation of the daily OC emission rates

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

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

**3.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months of issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the booth/oven split, as detailed in paragraph A.III.2.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 25 or 25A, as applicable, which are located in 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

An OC emissions test also shall be conducted on emissions unit P056 to determine oven/booth split as defined in section A.III.2 of this permit.

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

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

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| thermal cure flowcoater to clearcoat plastic parts | OAC rule 3745-31-05<br>PTI No. 03-9956 | 70.0 pounds OC/hr (see A.I.2.a.) |

**2. Additional Terms and Conditions**

**2.a** The 70.0 pounds OC/hr limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to demonstrate compliance with the hourly OC limitation.

### II. Operational Restrictions

**None**

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

**1.** The permit to install for this emissions unit was evaluated based on the actual 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 (or other Ohio EPA approved 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(s):

Pollutant: diacetone alcohol*

TLV (ug/m3): 238,000

Maximum Hourly Emission Rate (lbs/hr): 70.2

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,096

MAGLC (ug/m3): 5,667

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

## 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 still 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 (typically 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

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

Emission Limitation: 70.0 pounds OC/hr

Applicable Compliance Method: The permittee shall determine compliance with the limitation above by multiplying the maximum hourly coatings usage rate (gallons/hr) by the maximum OC content of all coating materials employed (lbs/gallon).

## VI. Miscellaneous Requirements

**None**

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