OhioEPA

State of Ohio Environmental Protection Agency

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

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

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

05/25/01

CERTIFIED MAIL

RE: Proposed Title V Chapter 3745-77 permit
01-24-01-0098
YUSA CORPORATION

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for YUSA CORPORATION, has been created in Ohio EPA's State Air Resources System (STARS) on 05/25/01, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Central District Office
Becky Castle, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date:	Effective Date:	Expiration Date:

This document constitutes issuance of a Title V permit for Facility ID: 01-24-01-0098 to:
YUSA CORPORATION
151 Jamison Rd. SW
Washington C.H., OH 43160

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

K002 (Manual Spray Booth)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K009 (Outer Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K010 (Inner Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K011 (Inner Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K012 (Outer Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K013 (Outer Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K014 (Inner Pipe Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K016 (Adhesive Spray Booth)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K017 (Small Parts Manual Spray Booth No. 1)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K018 (Small Parts Manual Spray Booth No. 2)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K021 (Manual Spray Booth)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K022 (Manual Spray Booth)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K024 (Rotary Adhesive Dipping Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

K025 (Resin Coating Machine)
Coated resin parts.

K027 (Top Hat Adhesive Machine)
Parts coated with adhesive in preparation for rubber-to-metal bonding.

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

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

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

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

annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the

Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

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

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

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

7. Fees

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

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

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

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

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

11. Federal and State Enforceability

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

12. Compliance Requirements

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

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

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

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

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC

rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

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

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

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

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

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

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

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

17. Compliance Method Requirements

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

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:

Boiler B- B001;
Boiler A- B002;
Air Make-up Unit HV2- B003;
Air Make-up Unit HV3- B004;
Air Make-up Unit HV4- B005;
Air Make-up Unit HV5- B006;
Air Make-up Unit HV1- B007;
Autoclave No. 1- P003;
Solvent/Adhesive Storage and Mix Room- P006;
Desma 400 Injection Press No. 1- P007;
Desma 400 Injection Press No. 2- P008;
Desma 400 Injection Press No. 3- P009;
Desma 2000 Injection Press No. 1- P010;
Desma 2000 Injection Press No. 2- P011;
Matsuda 2000 Injection Press No. 1- P012;
Matsuda 2000 Injection Press No. 2- P013;
Desma 1000 Injection Press No. 1- P014;
Desma 1000 Injection Press No. 2- P015;
Desma 1000 Injection Press No. 3- P016;
Desma 1000 Injection Press No. 4- P017;
Desma 1000 Injection Press No. 5- P018;
Desma 1000 Injection Press No. 6- P019;
Desma 1000 Injection Press No. 7- P020;
Desma 1000 Injection Press No. 8- P021;
Wakoseki 750 Injection Press No. 1- P022;
Wakoseki 750 Injection Press No. 2- P023;
Wakoseki 750 Injection Press No. 3- P024;
Wakoseki 750 Injection Press No. 4- P025;
Wakoseki 750 Injection Press No. 5- P026;
Wakoseki 750 Injection Press No. 6- P027;
Wakoseki 750 Injection Press No. 7- P028;
Wakoseki 750 Injection Press No. 8- P029;
Wakoseki 750 Injection Press No. 9- P030;
Wakoseki 750 Injection Press No. 10- P031;
Wakoseki 750 Injection Press No. 11- P032;
Wakoseki 750 Injection Press No. 12- P033;
Wakoseki 750 Injection Press No. 13- P034;
Wakoseki 750 Injection Press No. 14- P035;
Wakoseki 750 Injection Press No. 15- P036;
Wakoseki 750 Injection Press No. 16- P037;
Wakoseki 750 Injection Press No. 17- P038;
Matsuda 500 Injection Press No. 1- P039;
Matsuda 500 Injection Press No. 2- P040;

B. State Only Enforceable Section (continued)

Matsuda 500 Injection Press No. 3- P041;
Matsuda 500 Injection Press No. 4- P042;
Matsuda 500 Injection Press No. 5- P043;
Matsuda 500 Injection Press No. 6- P044;
Matsuda 500 Injection Press No. 7- P045;
Matsuda 500 Injection Press No. 8- P046;
Matsuda 500 Injection Press No. 9- P047;
Matsuda 500 Injection Press No. 10- P048;
Matsuda 500 Injection Press No. 11- P049;
Matsuda 500 Injection Press No. 12- P050;
Matsuda 500 Injection Press No. 13- P051;
Matsuda 500 Injection Press No. 14- P052;
Matsuda 500 Injection Press No. 15- P053;
Matsuda 500 Injection Press No. 16- P054;
Matsuda 500 Injection Press No. 17- P055;
14" Compression Press No. 1- P056;
14" Compression Press No. 2- P057;
14" Compression Press No. 3- P058;
14" Compression Press No. 4- P059;
14" Compression Press No. 5- P060;
14" Compression Press No. 6- P061;
14" Compression Press No. 7- P062;
14" Compression Press No. 8- P063;
14" Compression Press No. 9- P064;
14" Compression Press No. 10- P065;
14" Compression Press No. 11- P066;
Matsuda 500 Injection Press No. 26- P067;
Matsuda 500 Injection Press No. 27- P068;
Matsuda 500 Injection Press No. 28- P069;
Matsuda 500 Injection Press No. 29- P070;
Matsuda 500 Injection Press No. 30- P071;
14" Compression Press No. 12- P072;
14" Compression Press No. 13- P073;
14" Compression Press No. 14- P074;
14" Compression Press No. 15- P075;
Desma 1000 Injection Press No. 9- P076;
Desma 1000 Injection Press No. 10- P077;
Wakoseki 750 Injection Press No. 18- P078;
Wakoseki 750 Injection Press No. 19- P079;
Wakoseki 750 Injection Press No. 20- P080;
Wakoseki 750 Injection Press No. 21- P081;
Matsuda 500 Injection Press No. 18- P082;
Matsuda 500 Injection Press No. 19- P083;
Matsuda 500 Injection Press No. 20- P084;
Matsuda 500 Injection Press No. 21- P085;
Matsuda 500 Injection Press No. 22- P086;
Matsuda 500 Injection Press No. 23- P087;

B. State Only Enforceable Section (continued)

Matsuda 500 Injection Press No. 24- P088;
Matsuda 500 Injection Press No. 25- P089;
Autoclave No. 2- P090;
Autoclave No. 3- P091;
Autoclave No. 4- P092;
14" Compression Press No. 16- P093;
14" Compression Press No. 17- P094;
14" Compression Press No. 18- P095;
14" Compression Press No. 19- P096;
14" Compression Press No. 20- P097;
14" Compression Press No. 21- P098;
14" Compression Press No. 22- P099;
14" Compression Press No. 23- P100;
Matsuda 500 Injection Press No. 31- P101;
Matsuda 500 Injection Press No. 32- P102;
Matsuda 500 Injection Press No. 33- P103;
Matsuda 500 Injection Press No. 34- P104;
Matsuda 500 Injection Press No. 35- P105;
Matsuda 500 Injection Press No. 36- P106;
Matsuda 500 Injection Press No. 37- P107;
Matsuda 500 Injection Press No. 38- P108;
Matsuda 500 Injection Press No. 39- P109;
Matsuda 500 Injection Press No. 40- P110;
Matsuda 500 Injection Press No. 41- P111;
Matsuda 500 Injection Press No. 42- P112;
Wakoseki 1000 Injection Press No. 1- P113;
Wakoseki 1000 Injection Press No. 2- P114;
Wakoseki 1000 Injection Press No. 3- P115;
Matsuda 500 Injection Press No. 43- P116;
Matsuda 500 Injection Press No. 44- P117;
Matsuda 500 Injection Press No. 45- P118;
Matsuda 500 Injection Press No. 46- P119;
Wakoseki 750 Injection Press No. 22- P120;
Autoclave No. 5- P121;
Autoclave No. 6- P122;
Autoclave No. 7- P123;
Matsuda 500 Injection Press No. 47- P124;
Matsuda 500 Injection Press No. 48- P125;
Matsuda 500 Injection Press No. 49- P126;
Matsuda 500 Injection Press No. 50- P127;
Matsuda 500 Injection Press No. 51- P128;
Matsuda 500 Injection Press No. 52- P129;
Matsuda 500 Injection Press No. 53- P130;
Matsuda 500 Injection Press No. 54- P131;
Matsuda 500 Injection Press No. 55- P132;
Matsuda 500 Injection Press No. 56- P133;
Matsuda 500 Injection Press No. 57- P134;
Matsuda 500 Injection Press No. 58- P135;
Autoclave No. 8- P136;
Autoclave No. 9- P137;
Matsuda 500 Injection Press No. 59- P138;

B. State Only Enforceable Section (continued)

Matsuda 500 Injection Press No. 60- P139;
Matsuda 500 Injection Press No. 61- P140;
Matsuda 500 Injection Press No. 62- P141;
Matsuda 500 Injection Press No. 63- P142;
Matsuda 500 Injection Press No. 64- P143;
Matsuda 500 Injection Press No. 65- P144;
Matsuda 500 Injection Press No. 66- P145;
Autoclave No. 10- P146;
Autoclave No. 11- P147;
Autoclave No. 12- P148;
Autoclave No. 13- P149;
Autoclave No. 14- P150;
Autoclave No. 15- P151;
Autoclave No. 16- P152;
Autoclave No. 17- P153;
Matsuda 1000 Injection Press No. 1- P154;
Matsuda 1000 Injection Press No. 2- P155;
Wakoseki 750 Injection Press No. 23- P156;
Wakoseki 750 Injection Press No. 24- P157;
Matsuda 500 Injection Press No. 67- P158;
Matsuda 500 Injection Press No. 68- P159;
Matsuda 500 Injection Press No. 69- P160;
Matsuda 500 Injection Press No. 70- P161;
Matsuda 500 Injection Press No. 71- P162;
Matsuda 500 Injection Press No. 72- P163;
Matsuda 500 Injection Press No. 73- P164;
Matsuda 500 Injection Press No. 74- P165;
Matsuda 500 Injection Press No. 75- P166;
Matsuda 500 Injection Press No. 76- P167;
Matsuda 500 Injection Press No. 77- P168;
Matsuda 500 Injection Press No. 78- P169;
Wakoseki 1000 Injection Press No. 4- P170;
Matsuda 1000 Injection Press No. 3- P171;
Matsuda 1000 Injection Press No. 4- P172;
Matsuda 500 Injection Press No. 79- P173;
Matsuda 500 Injection Press No. 80- P174;
Matsuda 500 Injection Press No. 81- P175;
Matsuda 500 Injection Press No. 82- P176;
Matsuda 500 Injection Press No. 83- P177;
Matsuda 500 Injection Press No. 84- P178;
Matsuda 500 Injection Press No. 85- P179;
Matsuda 500 Injection Press No. 86- P180;
Matsuda 500 Injection Press No. 87- P181;
Matsuda 500 Injection Press No. 88- P182;
Matsuda 500 Injection Press No. 89- P183;
Matsuda 500 Injection Press No. 90- P184;
Matsuda 500 Injection Press No. 91- P185;
Matsuda 500 Injection Press No. 92- P186;

Tube Printing Operation- K023; and
Hydro Mt. Paint Line Number 1- K026.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Spray Booth (K002)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
manual adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.388 pound per hour and 1.7 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.388 pound per hour and 1.7 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
manual adhesive spray booth controlled with a PTE and thermal incinerator.	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: Outer Pipe Machine (K009)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	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: Inner Pipe Machine (K010)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	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: Inner Pipe Machine (K011)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	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: Outer Pipe Machine (K012)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	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: Outer Pipe Machine (K013)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Outer Pipe Machine.	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: Inner Pipe Machine (K014)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	OAC rule 3745-31-05(A)(3) (PTI 01-5631)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.298 pound per hour and 1.31 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray operation controlled with a permanent total enclosure (PTE) and thermal incinerator - Inner Pipe Machine.	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: Adhesive Spray Booth (K016)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator.	OAC rule 3745-31-05(A)(3) (PTI 01-6435)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.32 pound per hour and 1.4 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.32 pound per hour and 1.4 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator.	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: Small Parts Manual Spray Booth No. 1 (K017)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
manual adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator - Small Parts Manual Spray Booth #1.	OAC rule 3745-31-05(A)(3) (PTI 01-6784)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.14 pound per hour and 0.61 ton per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.14 pound per hour and 0.61 ton per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K017, K018, K021, and K022 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
manual adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator - Small Parts Manual Spray Booth #1.	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: Small Parts Manual Spray Booth No. 2 (K018)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
manual adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator - Small Parts Manual Spray Booth #2.	OAC rule 3745-31-05(A)(3) (PTI 01-6784)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.14 pound per hour and 0.61 ton per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.14 pound per hour and 0.61 ton per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
Particulate emissions shall not exceed 0.551 pound per hour.

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

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

V. Testing Requirements (continued)

5. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K017, K018, K021, and K022 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
manual adhesive spray booth controlled with a permanent total enclosure (PTE) and thermal incinerator - Small Parts Manual Spray Booth #2.	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: Manual Spray Booth (K021)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
manual adhesive spray booth with particulate filtration system and controlled with a permanent total enclosure (PTE) and thermal incinerator.	OAC rule 3745-31-05(A)(3) (PTI 01-7333)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 99%.

VOC emissions shall not exceed 0.027 pound per hour and 0.118 ton per year.

Use of particulate filtration system when this emissions unit is in operation.

Particulate emissions shall not exceed 0.03 grain per dry standard cubic foot and 2.41 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC and particulate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.027 pound per hour and 0.118 ton per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitations -
Particulate emissions shall not exceed 0.551 pound per hour, 0.03 grain per dry standard cubic foot, and 2.41 tons per year.

Applicable Compliance Method -
To determine the actual worst case hourly emission rate for particulates, the following equation shall be used:

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

Compliance with the ton per year emission limitation shall be determined by multiplying the worst case hourly emission rate above by 8760 hours per year and dividing by 2000.

If required, the permittee shall demonstrate compliance with the hourly and/or grain loading emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

5. Emission Limitation -
A minimum control efficiency of 99% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K017, K018, K021, and K022 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
manual adhesive spray booth controlled with a PTE and thermal incinerator.	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: Manual Spray Booth (K022)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
manual adhesive spray booth with particulate filtration system and controlled with a permanent total enclosure (PTE) and thermal incinerator.	OAC rule 3745-31-05(A)(3) (PTI 01-7333)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a below and compliance with the particulate and visible particulate emission limitations specified in OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 99%.

VOC emissions shall not exceed 0.027 pound per hour and 0.118 ton per year.

Use of particulate filtration system when this emissions unit is in operation.

Particulate emissions shall not exceed 0.03 grain per dry standard cubic foot and 2.41 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC and particulate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.027 pound per hour and 0.118 ton per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitations -
Particulate emissions shall not exceed 0.551 pound per hour, 0.03 grain per dry standard cubic foot, and 2.41 tons per year.

Applicable Compliance Method -
To determine the actual worst case hourly emission rate for particulates, the following equation shall be used:

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

where:

E = particulate matter emission rate (lbs/hr),
M = maximum coating solids usage rate (2.16 lbs/hr),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.25 for air spray guns),
CE = control efficiency of the control equipment (90% for the filtration system).

Compliance with the ton per year emission limitation shall be determined by multiplying the worst case hourly emission rate above by 8760 hours per year and dividing by 2000.

If required, the permittee shall demonstrate compliance with the hourly and/or grain loading emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

4. Emission Limitation -
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

5. Emission Limitation -
A minimum control efficiency of 99% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures.

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K017, K018, K021, and K022 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

6. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
manual adhesive spray booth controlled with a PTE and thermal incinerator.	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: Rotary Adhesive Dipping Machine (K024)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
rotary adhesive dipping machine controlled with a permanent total enclosure and a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 01-8031)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a-c below .
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.38 pound per hour and 1.67 tons per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.38 pound per hour and 1.67 tons per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures:

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

5. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
rotary adhesive dipping machine controlled with a permanent total enclosure and a thermal incinerator	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: Resin Coating Machine (K025)

Activity Description: Coated resin 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
K025 - resin coating machine	OAC rule 3745-31-05(A)(3) (PTI # 01-08160)	Organic compound emissions shall not exceed 0.68 pound per hour and 2.97 tons per year.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

a. The company identification for each coating and cleanup material employed.

b. The number of gallons of each coating and cleanup material employed.

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

d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.

e. The total number of hours the emissions unit was in operation.

f. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 0.68 pound per hour, and the actual average hourly organic compound emission rate for each such day.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
Organic compound emissions shall not exceed 0.68 pound per hour and 2.97 tons per year.

Applicable Compliance Method-
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.1. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K025 - resin coating machine	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 (K025) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the TSCREEN. The predicted 1-hour maximum ground-level concentration from the use of the TSCREEN 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: Isopropyl Alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.68

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1.66

MAGLC (ug/m3): 23,405

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:

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

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

2. 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: Top Hat Adhesive Machine (K027)

Activity Description: Parts coated with adhesive in preparation for rubber-to-metal bonding.

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
Top Hat adhesive machine controlled with a permanent total enclosure and a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 01-08186)	The best available technology (BAT) determination for this emissions unit is compliance with the control requirements and emission limitations specified in Section A.I.2.a-c below .
	OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

VOC emissions shall not exceed 0.078 pound per hour and 0.339 ton per year.

2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.c The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in Method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

j. The average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the hourly VOC emission limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

2. Emission Limitations -
VOC emissions shall not exceed 0.078 pound per hour and 0.339 ton per year.

Applicable Compliance Method -
Compliance with the hourly limitation shall be based upon the records required pursuant to Section A.III.2. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

3. Emission Limitation -
A minimum control efficiency of 95% for the thermal incinerator.

Applicable Compliance Method -
Compliance with the vapor control efficiency requirement shall be demonstrated through emission tests performed in accordance with the following procedures:

The emission tests shall be conducted within 1 year after permit issuance and 6 months prior to permit expiration.

The following test methods shall be employed to determine the control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The test method shall be selected based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The tests shall be conducted while emissions units K002, K009, K010, K011, K012, K013, K014, K016, K024 and K027 are venting VOC emissions to the thermal incinerator. The emissions units shall be operated at or near their maximum capacity during the tests, unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

5. U.S. EPA Method 24 and the procedures specified in OAC rule 3745-21-10(B) shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the coating or cleanup material manufacturer.

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
Top Hat adhesive machine controlled with a permanent total enclosure and a thermal incinerator	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

1. Modeling to demonstrate compliance with the OHIO EPA's " Air Toxics Policy" was not necessary because the emission unit's maximum annual emissions for each toxic compound will be less than 1 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

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