08/26/2026

Ms. Gabriela Landeros
OPmobility Exterior USA LLC
4685 Investment Drive
Troy, MI 48098

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0487010089
Permit Number: P0140793
Permit Type: Initial Installation
County: Wood

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, ***Weekly Review and Public Notices***. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: ***eDocument Search | Ohio Environmental Protection Agency***. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Toledo Department of Environmental Services
348 South Erie St.
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, ***Weekly Review and Public Notices | Ohio Environmental Protection Agency***. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Michigan; Indiana; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: ***Weekly Review and Public Notices | Ohio Environmental Protection Agency*** or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: ***HClerk@epa.ohio.gov***

Draft Air Pollution Permit-to-Install and Operate Initial Installation

OPmobility Exterior USA LLC
29755 Glenwood Road
Rossford, OH 43460

ID#: P0140793
Date of Action: 08/26/2026
Permit Desc: This facility will manufacture and coat miscellaneous plastic parts and products for the automotive industry.

The permit and complete instructions for requesting information or submitting comments may be obtained at: https://ohioepa.commentinput.com - Search by entering the permit # P0140793 in the "Search Projects" search box.

Ohio Environmental Protection Agency

Permit Number: P0140793
Facility Name: OPmobility Exterior USA LLC
Facility ID: 0487010089
Effective Date: To be entered upon final issuance

Permit Strategy Write-Up

1. Check all that apply:

   ☒ Synthetic Minor Determination

   ☐ Netting Determination

2. Source Description:

   OPmobility Exterior USA LLC (OPmobility) plans to construct and operate a facility to manufacture miscellaneous plastic parts and products for the automotive industry in Rossford, Wood County, Ohio. The facility will operate six fiber-reinforced polypropylene plastic closed molding lines. The molded parts will be washed, dried and then tempered prior to application of a primer, base coat, and clear coat finish. Dry filtration systems will control the particulate emissions from each coating operation. The exhaust gas streams from the primer spray booth and associated flash-off tunnel, base coat spray booth and associated flash-off tunnel, clear coat spray booth and associated flash-off tunnel, and the clear coat drying oven will be captured by permanent total enclosures and routed to a regenerative thermal oxidizer (RTO) designed to achieve a minimum 97 percent VOC and HAP destruction efficiency.

   This FEPTIO is for the initial installation of these operations.

3. Facility Emissions and Attainment Status:

   This facility is a minor source for PM_{10} SO_2, NO_x, and CO emissions. The facility is a synthetic minor source of VOC, individual HAP and combined HAP emissions. Wood County is in attainment for all criteria pollutants.

4. Source Emissions:

K001 Plastic Parts and Products Paint Line

Particulate emissions from coatings and clear coat drying oven combustion emissions (K001)

Coating (as applied)	PTE throughput (gal/hr)	Density (lb/gal)	Overspray percent	Solids (lb/gal)	Uncontrolled particulate Emissions		Controlled particulate Emissions (99% CE)	
					lb/hr	TPY	lb/hr	TPY
Primer	8.7	8.34	70	1.83	11.14	48.79	0.11	0.49
Base Coat	10.3	8.18	35	1.72	6.20	27.16	0.06	0.27
Clear Coat	8.5	8.34	35	4.42	13.15	57.60	0.13	0.58

Purge Solvent	0.384	6.84	-	0	0	0	0	0
Clear coat drying oven combustion emissions	1.23 MMBtu of natural gas/hr	-	-	-	0.01	0.04	0.01	0.04
				Total	30.50	133.59	0.31	1.38

Uncontrolled coating particulate emissions (lb/hr) = (throughput in gal/hr)(solids in lb/gal)(transfer eff in %)

Uncontrolled coating particulate emissions (TPY) = (Uncontrolled coating particulate emissions in lb/hr)(8760 hr/yr)/(2000 lb/ton)

Controlled coating particulate emissions = (uncontrolled particulate emissions)(1-0.99)

Clear coat oven combustion emissions (lb/hr) = (EF AP-42 Table 1.4-2 PM total – 0.00745 lb/MMbtu)(natural gas throughput –inMMbtu/hr)

Clear coat combustion emissions (TPY) = (Clear coat combustion emissions in lb/hr)(8760 hr/yr)/(2000 lb/ton)

This emissions unit is subject to the federally enforceable SIP requirements of OAC rule 3745-17-11(C), which require the surface coating process to be controlled by a dry particulate filter, waterwash system, or equivalent control device. The permittee proposes to control particulate emissions from the primer, base coat, and clear coat spray booths using three-stage dry particulate filters with a design control efficiency of 99%. Facility reported 99.9% on permit application, but willing to accept 99% without providing documentation from manufacturer in the interest of time. The spray booths are enclosed in a permanent total enclosure meeting the requirements of EPA Methods 204 through 204F in 40 CFR Part 51, Appendix M, allowing 100 percent capture of the process exhaust. Because particulate emissions are less than 10 tons per year after application of these federally enforceable controls, BAT does not apply.

This emissions unit is subject to federally enforceable synthetic minor emissions limitations for VOC and HAP emissions. To demonstrate compliance with these limitations, the permittee will operate the primer spray booth and flash-off tunnel, base coat spray booth and flash-off tunnel, clear coat spray booth and flash-off tunnel, and clear coat drying oven as a permanent total enclosure meeting the requirements of EPA Methods 204 through 204F in 40 CFR Part 51, Appendix M, providing 100 percent capture of the process VOC and HAP emissions. The captured emissions are routed to a regenerative thermal oxidizer (RTO) designed to achieve a minimum VOC and HAP destruction efficiency of 97%. Permit terms requiring operation, monitoring, recordkeeping, and reporting for the permanent total enclosure and RTO have been included to make the capture system and control efficiency federally enforceable. The controlled VOC and HAP emissions calculated using these federally enforceable controls support the synthetic minor emissions limitations established in the permit.

The facility states in the design of the full enclosure: The design of the paint line is such that we do not have any natural draft openings (NDOs, as defined in EPA Method 204) and have theoretically have a full

enclosure. Referring to the process flow diagram – from the stabilization tunnel immediately preceding the primer booth through the clear coat drying oven we understand there are no openings between stages or other spaces that are permanently open during source operation. The outlet ramp of the clear coat drying oven is designed with air seal where the one of the interior door or exterior door is always closed, eliminating an NDO at this point. There will be a number of access doors and observation panels throughout the line that will be closed during source operation and are not considered NDOs as defined. The permit requires routine checks of these non-NDOs for positive pressure/leakage; we concur with that requirement. If field construction of the paint line results in installation of an NDO(s) for whatever reason, we will make the appropriate Method 204 compliance demonstrations as required.

VOC emissions from coating operation and clear coat drying oven (K001)

Coating (as applied)	PTE coating throughput gal/hr	VOC content lbs/gal	Uncontrolled emissions		Controlled emissions* (97% DE)	
			lb/hr	TPY	lb/hr	TPY
Primer	8.7	6.51	56.64	248.07	1.70	7.44
Base Coat	10.3	6.46	66.54	291.44	2.00	8.74
Clear Coat	8.5	3.92	33.32	145.94	1.00	4.38
Purge Solvent	0.384	6.84	2.63	11.50	0.08	0.35
Clear coat drying oven combustion emissions	1.23 MMBtu of natural gas/hr	-	0.0007	0.03	0.0007	0.03
		Total	159.13	696.98	4.78	20.94

VOC emissions were calculated based on the maximum potential usage rate of each coating and associated purge solvent multiplied by the VOC content of each material.

VOC (lb/hr) = (Maximum potential usage rate [gal/hr]) × (VOC content [lb/gal])

VOC (TPY) = (VOC emissions [lb/hr]) × (8,760 hr/yr) ÷ (2,000 lb/ton)

*Controlled VOC emissions are based on the operation of a permanent total enclosure (PTE) achieving 100 percent capture in accordance with EPA Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The captured VOC emissions are routed to a regenerative thermal oxidizer (RTO) designed to achieve a minimum 97 percent VOC destruction efficiency.

Clear coat drying oven combustion emissions (lb/hr) = (EF AP-42 Table 1.4-2 VOC – 0.00539 lb of VOC/MMbtu)(natural gas throughput – MMbtu/hr)

Clear coat combustion emissions (TPY) = (Clear coat combustion emissions - lb/hr)(8760 hr/yr)/(2000 lb/ton)

HAP content for coatings (K001) (pounds per gallon)

Coating	Total HAP	xylene	napthalene	ethylbenzene	toluene	hexa methyleme-1,6-diisocyanate	MIBK	cumene
Primer	4.39	2.84	0.15	0.73	0.33	0.01	0.33	0
Base Coat*	2.15	1.64	0.02	0.41	0	0	0	0.08
Clear Coat	0.71	0.63	0	0	0	0.004	0	0.08
Purge Solvent	0.14	0.07	0	0	0	0	0	0.07

*Several Base Coat formulations may be used. The HAP content presented above represents the worst case concentration for each individual HAP among all approved Base Coat formulations.

HAP emissions from the clear coat drying oven combustion emissions are negligible compared to the coating HAP emissions

Uncontrolled HAP emissions from coatings and clear coat drying oven (pounds per hour followed by tons per year)

Coating	Total HAP	xylene	napthalene	ethylbenzene	toluene	hexa methyleme-1,6-diisocyanate	MIBK	cumene
Primer	38.17 167.16	24.67 108.05	1.31 5.72	6.31 27.65	2.90 12.71	0.07 0.32	2.92 12.71	0 0
Base Coat	22.15 97.00	16.85 73.81	0.13 0.55	4.22 18.50	0 0	0 0	0 0	0.83 3.61
Clear Coat	6.04 26.45	5.36 23.48	0 0	0 0	0 0	0.04 0.18	0 0	0.68 2.98
Purge Solvent	0.05 0.24	0.03 0.12	0 0	0 0	0 0	0 0	0 0	0.03 0.12
Clear coat drying oven combustion emissions	<0.0001 <0.0001	0 0	<0.0001 <0.0001	0 0	<0.0001 <0.0001	0 0	0 0	0 0

Total	64.41 290.85	46.91 205.46	1.44 6.27	10.53 46.15	2.90 12.71	0.11 0.50	2.92 12.71	1.54 6.71

HAP emissions (pound/hour) = (HAP content in pounds per gallon)(PTE throughput in gallons/hour)

HAP emissions (tons per year) = (HAP emissions in pounds/hour)(8760 hours per year) / (2000 pounds per ton)

Controlled HAP emissions from coatings (K001) (pounds per hour followed by tons per year)

Coating	Total HAP	xylene	napthalene	ethylbenzene	toluene	hexa methyleme-1,6-diisocyanate	MIBK	cumene
Primer	1.15 5.02	0.74 3.24	0.04 0.17	0.19 0.83	0.09 0.38	0.002 0.01	0.09 0.38	0 0
Base Coat	0.67 2.91	0.51 2.22	0.004 0.02	0.13 0.56	0 0	0 0	0 0	0.03 0.11
Clear Coat	0.18 0.79	0.16 0.70	0 0	0 0	0 0	0.001 0.005	0 0	0.02 0.09
Purge Solvent	0.002 0.007	0.001 0.004	0 0	0 0	0 0	0 0	0 0	0.001 0.004
Clear coat drying oven combustion emissions	<0.0001 <0.0001	0 0	<0.0001 <0.0001	0 0	<0.0001 <0.0001	0 0	0 0	0 0
Total	2.00 8.72	1.41 6.16	0.044 0.19	0.32 1.39	0.09 0.38	0.003 0.02	0.09 0.38	0.05 0.21

The controlled total HAP emissions from K001 are 8.95 tons per year, including 6.16 or 6.2 tons per year of xylene as the highest individual HAP. Federally enforceable permit limitations under OAC rule 3745-31-05(D) restricting operation of the paint line, operation of the permanent total enclosure, and operation of the RTO have been established to limit combined HAP emissions below 10 tons per year and individual HAP emissions below 10 tons per year.

Controlled HAP emissions are based on operation of a permanent total enclosure (PTE) meeting the requirements of EPA Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, providing 100

percent capture of HAP-containing process emissions. The captured emissions are routed to a regenerative thermal oxidizer (RTO) designed to achieve a minimum 97 percent HAP destruction efficiency.

Facility-Wide Emissions

Total Uncontrolled Potential facility-wide emissions (tons per year)

Emission Unit	PM_{10}	SO_2	NO_x	CO	VOC
B001/EU05	0.04	0.003	0.47	0.40	0.03
B002/EU11	0.65	0.05	8.59	7.21	0.47
B003/EU10	0.10	0.01	1.36	1.14	0.07
B004/EU09	0.11	0.01	1.43	1.20	0.08
B005/EU03	0.02	0.002	0.32	0.27	0.02
K001/EU07, EU08	133.55	0.003	0.53	0.44	696.95
L001/EU04a	0	0	0	0	0.89
P001 – P005*/ EU01	5.26	0	0	0	0
P006	0.90	0	0	0	0
P007	0.90	0	0	0	0
P008	0.90	0	0	0	0
P009	0.90	0	0	0	0
P010	0.90	0	0	0	0
P011	0.90	0	0	0	0
P012/EU02	0.04	0	0	0	0.98
P013/EU02	0.04	0	0	0	0.98
P014/EU02	0.04	0	0	0	0.98
P015/EU02	0.04	0	0	0	0.98
P016/EU02	0.04	0	0	0	0.98
P017/EU02	0.04	0	0	0	0.98
P018/EU04	0	0	0	0	0.70
P019/EU06	0.02	0.05	0.44	0.25	0.03
P020/EU12	0.03	0.001	2.52	0.54	0.21

Total	145.42	0.13	15.6	11.45	705.33

*The permittee will submit a permit application for these emissions units. This permit application listed these emissions units as de minimimis. Ohio EPA does not consider the bin vent controls to be integral to the emissions unit, therefore are not considered for de minimis calculations. The annual emissions for these combined silos are based on the potential throughput of plastic pellets from the molding machines, which is a process limitation for the silos.

Total Controlled facility-wide emissions (tons per year)

Emission Unit	PM_{10}	SO_2	NO_x	CO	VOC
B001/EU05	0.04	0.003	0.47	0.40	0.03
B002/EU11	0.65	0.05	8.59	7.21	0.47
B003/EU10	0.10	0.01	1.36	1.14	0.07
B004/EU09	0.11	0.01	1.43	1.20	0.08
B005/EU03	0.02	0.002	0.32	0.27	0.02
K001/EU07, EU08	1.42	0.003	0.53	0.44	20.94
L001/EU04a	0	0	0	0	0.89
P001 – P005*/ EU01	0.04	0	0	0	0
P006	0.007	0	0	0	0
P007	0.007	0	0	0	0
P008	0.007	0	0	0	0
P009	0.007	0	0	0	0
P010	0.007	0	0	0	0
P011	0.007	0	0	0	0
P012/EU02	0.04	0	0	0	0.98
P013/EU02	0.04	0	0	0	0.98
P014/EU02	0.04	0	0	0	0.98
P015/EU02	0.04	0	0	0	0.98
P016/EU02	0.04	0	0	0	0.98
P017/EU02	0.04	0	0	0	0.98

P018/EU04	0	0	0	0	0.70
P019/EU06	0.02	0.05	0.44	0.25	0.03
P020/EU12	0.03	0.001	2.52	0.54	0.21
Total	2.71	0.13	15.66	11.45	29.32

*The permittee will submit permit applications for these emissions units. Permit application listed these emissions units as de minimimis. Ohio EPA does not consider the bin vent controls to be integral to the emissions unit, therefore are not considered for de minimis calculations.

Total Uncontrolled Potential Facility-wide HAP emissions (tons per year)

EU	Total HAP	xylene	napthalene	ethylbenzene	n-hexane	toluene	hexamethylene-1,6-diisocyanate	MIBK	cumene
B001/EU05	0.009	0	<0.0001	0	0.0085	<0.0001	0	0	0
B002/EU11	0.16	0	<0.0001	0	0.15	0.0003	0	0	0
B003/EU10	0.026	0	<0.0001	0	0.025	0.0003	0	0	0
B004/EU09	0.027	0	<0.0001	0	0.025	<0.0001	0	0	0
B005/EU03	0.009	0	<0.0001	0	0.0085	<0.0001	0	0	0
K001*/EU07	290.85	205.46	6.27	46.15	0	12.71	0.50	12.71	6.71
L001/EU04a	0.04	0.02	0	0	0	0	0	0	0.02
P001–P005/EU01	0	0	0	0	0	0	0	0	0
P006	0	0	0	0	0	0	0	0	0
P007	0	0	0	0	0	0	0	0	0
P008	0	0	0	0	0	0	0	0	0
P009	0	0	0	0	0	0	0	0	0
P010	0	0	0	0	0	0	0	0	0
P011	0	0	0	0	0	0	0	0	0

P012**/ EU02	0.0008	0	0	0	0	0	0	0	0
P013**/ EU02	0.0008	0	0	0	0	0	0	0	0
P014**/ EU02	0.0008	0	0	0	0	0	0	0	0
P015**/ EU02	0.0008	0	0	0	0	0	0	0	0
P016**/ EU02	0.0008	0	0	0	0	0	0	0	0
P017**/ EU02	0.0008	0	0	0	0	0	0	0	0
P018/EU04	0.28	0.21	0.007	0.031	0	0.013	0.0005	0.013	0.007
P019/EU06	0	0	0	0	0	0	0	0	0
P020/EU12	0.003	0.0002	<0.0001	0	0	<0.0001	0	0	0
Total	291.41	205.69	6.277	46.18	0.217	12.723	0.501	12.723	6.74

*HAP emissions from clear coat drying oven combustion emissions are negligible compared to the coating HAP emissions

**HAP emissions for injection molding lines consist of Formaldehyde, Acrolein, Acetaldehyde and Propionaldehyde. These individual HAPs are negligible but the total of all these individual HAPs are reported for completeness.

There are additional HAP emissions from natural gas combustion which have a potential of less than 10 pounds per year. These were evaluated and added to the total HAP emissions but not listed here since they are negligible.

Total Controlled Facility-wide HAP emissions (tons per year)

EU	Total HAP	xylene	napthalene	ethylbenzene	n-hexane	toluene	hexamethylene-1,6-diisocyanate	MIBK	cumene
B001/EU05	0.009	0	<0.0001	0	0.0085	<0.0001	0	0	0

B002/EU11	0.16	0	<0.0001	0	0.15	0.0003	0	0	0
B003/EU10	0.026	0	<0.0001	0	0.025	0.0003	0	0	0
B004/EU09	0.027	0	<0.0001	0	0.025	<0.0001	0	0	0
B005/EU03	0.009	0	<0.0001	0	0.0085	<0.0001	0	0	0
K001/EU07	8.72	6.16	0.19	1.39	0	0.38	0.02	0.38	0.21
L001/EU04 a	0.04	0.02	0	0	0	0	0	0	0.02
P001–P005/ EU01	0	0	0	0	0	0	0	0	0
P006	0	0	0	0	0	0	0	0	0
P007	0	0	0	0	0	0	0	0	0
P008	0	0	0	0	0	0	0	0	0
P009	0	0	0	0	0	0	0	0	0
P010	0	0	0	0	0	0	0	0	0
P011	0	0	0	0	0	0	0	0	0
P012**/ EU02	0.0006	0	0	0	0	0	0	0	0
P013**/ EU02	0.0006	0	0	0	0	0	0	0	0
P014**/ EU02	0.0006	0	0	0	0	0	0	0	0
P015**/ EU02	0.0006	0	0	0	0	0	0	0	0
P016**/ EU02	0.0006	0	0	0	0	0	0	0	0
P017**/ EU02	0.0006	0	0	0	0	0	0	0	0
P018/EU04	0.28	0.21	0.007	0.031	0	0.013	0.0005	0.013	0.007
P019/EU06	0	0	0	0	0	0	0	0	0
P020/EU12	0.003	0.0002	<0.0001	0	0	<0.0001	0	0	0

Total	9.28	6.39	0.20	1.42	0.22	0.39	0.02	0.39	0.23

Federal Regulation Applicability

40 CFR Part 60. Subpart MM, "Standards of Performance for Automobile and Light-Duty Truck Surface Coating Operation", does not apply because the facility does not coat automobile or light-duty truck bodies or body components as part of an automobile assembly plant coating operation. The facility coats plastic parts prior to assembly into vehicles.

40 CFR Part 63 Subpart HHHHHH –does not apply because OPmobility does not perform any of the regulated activities identified in 40 CFR 63.11169. The facility does not perform paint stripping operations, does not perform motor vehicle or mobile equipment refinishing, and does not use any of the target HAP-containing coatings identified in this subpart (methylene chloride, chromium, lead, manganese, nickel, or cadmium).

40 CFR Part 63 Subpart CCCCCCC – "Area Source Paints. and Allied Products Manufacturing". Subpart CCCCCC specifically states that "Paints and allied products manufacturing" does not manufacture paints or allied products. The facility only mixes coatings for use in its own surface coating operations. Activities performed by end users of paints or allied products to prepare those materials for application are excluded from this source category.

40 CFR Part 63 Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. In order to be subject to this source, per 40 CFR Part 63.4481(b): "You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in 40 CFR Part 63.4482, that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. With the synthetic minor restriction on HAP, this facility is not a major source of HAP and therefore not subject to this rule.

SIP Rule Applicability

OAC rule 3745-21-09(C), "Surface Coating of Automobiles and Light-Duty Trucks" does not apply to OPmobility or Paint Line PL1. OPmobility coats plastic automotive parts that are not attached to an automobile or light duty truck when painted. OAC 37845-21-09(C) only applies to the application of surface coatings, except sound-proofing materials, to the frame, main body, interior panels and exterior sheet metal such as the hood, trunk lid, fenders, cargo boxes, doors and grill openings of an automobile or light-duty truck and to other parts that are coated along with these bodies or body parts.

OAC rule 3745-21-26, "Surface Coating of Miscellaneous Metal and Plastic Parts" does not apply to OPmobility or Paint Line PL1. Wood County is not among the counties listed in OAC 3745-21-26(A)(1)(b) where this regulation is applicable.

5. Conclusion:

The permittee has accepted federally enforceable VOC and HAP emission limitations for the Paint Line (K001) to restrict facility-wide potential emissions below major source thresholds and avoid Title V permitting and PSD

review. The permittee will submit a separate permit application for the plastic pellet storage silos (P001 – P005) and these emissions units will be processed in parallel with this permit. The permittee will also submit a PBR application for the emergency fire pump (P020). The permittee has provided calculations to demonstrate de minimis emissions or a qualifying permit exemption for the other emissions units at this facility. When the allowable VOC and HAP emissions under the synthetic minor restrictions on the paint line (K001) are combined with the potential emissions from the remaining emissions units, facility-wide emissions remain below the thresholds requiring Title V permitting.

This permit will be issued draft with a public comment period so the permit terms will be federally enforceable.

6. Please provide additional notes or comments as necessary:

B001/EU05 Natural gas direct fired oven

This 1.10 MMBtu/hr natural gas fired oven is used to dry water off plastic parts after they have been washed. It was determined to be permit exempt per OAC rule 3745-31-03(B)(1)(a) for fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than or equal to ten million British thermal units per hour burning only natural gas, distillate oil, biodiesel, or liquid petroleum gas.

B002/EU11 natural gas fired building heater

These comfort air heaters total 20 mmbtu/hr but each are less than 10 MMBtu/hr and were determined to be permit exempt per OAC rule 3745-31-03(B)(1)(a) for fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than or equal to ten million British thermal units per hour burning only natural gas, distillate oil, biodiesel, or liquid petroleum gas.

B003/EU10 Paint Line Fresh Air makeup heating unit

This is a 3.17 MMBtu/hr natural gas air heater that preheats fresh air for paint line process and was determined to be permit exempt per OAC rule 3745-31-03(B)(1)(a) for fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than or equal to ten million British thermal units per hour burning only natural gas, distillate oil, biodiesel, or liquid petroleum gas.

B004/EU09 Paint mix room Fresh Air makeup heating unit

This is a 3.34 MMBtu/hr natural gas air heater that provides fresh air for paint mix room and was determined to be permit exempt per OAC rule 3745-31-03(B)(1)(a) for fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than or equal to ten million British thermal units per hour burning only natural gas, distillate oil, biodiesel, or liquid petroleum gas.

B005/EU03 Natural gas burners to temper molded parts

Six natural gas burners totaling 0.75 MMBtu per hour used to temper the molded parts and were determined to be permit exempt per OAC rule 3745-31-03(B)(1)(a) for fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than or equal to ten million British thermal units per hour burning only natural gas, distillate oil, biodiesel, or liquid petroleum gas.

K001/EU07 & EU08 Plastic Parts and Products Paint Line

After the fiber reinforced polypropylene parts are molded, washed and tempered, they are sprayed first with a primer, then a base coat and then finished with a clear coat in this emissions unit. The Primer spray booth and

flash-off tunnel, Base Coat spray booth and flash-off tunnel, and Clear Coat spray booth and flash-off tunnel, and the indirect heated Clear Coat drying oven have total enclosure per EPA Method 204 to capture 100% of the exhaust for this emissions unit. Terms from the Ohio EPA Standard Terms and Conditions Library J.PTE1 for "Permanent total enclosure meeting the requirements of Method 204" have been added to the permit. The particulate emissions from the primer, base coat and clear coat spray booths are each controlled with a three-stage dry particulate filter with a 99% capture efficiency (permittee claimed 99.9% efficiency but will accept 99% for expediency since does not have readily available filter efficiency manufacture data to support the 99.9%) based on federally enforceable OAC rule 3745-17-11(C). Terms from the Ohio EPA Standard Terms and Conditions Library J.FLTRcn "Requirements for non-exempt Spray Booths or Surface Coating Processes using a dry particulate filter control system, not yet installed" were added to the permit. The VOC- and HAP-containing process exhaust captured by the permanent total enclosure is routed to a regenerative thermal oxidizer (RTO) designed to achieve a minimum destruction efficiency of 97 percent. Terms from the Ohio EPA Standard Terms and Conditions Library J.PTE1 have been included to require operation of the permanent total enclosure, and terms from Library J.Ton have been included to establish the operational monitoring, recordkeeping, and reporting requirements necessary to make the RTO performance federally enforceable.

EU08 Clear Coat Oven Heater

This natural gas combustion heater was claimed as separate emissions unit by permittee, but since this oven is part of the coating process (this indirectly heated natural gas oven is the final dry after clear coat application and emissions are captured by the total enclosure and routed to the RTO), the natural gas combustion emissions to indirectly heat this oven have been added to this emissions unit (K001) even through the emissions have a separate egress point. This heater consists of two natural gas burners totaling 1.23 MMBtu/hr used to indirectly heat clear coat drying oven.

The permittee provided AERMOD dispersion modelling for air toxics per OAC rule 3745-114 and ORC 3704.03(F)(4)(d) with xylene as the worst-case scenario. The Predicted One-Hour Maximum Ground-Level Concentration was 43.21 µg/m^3, well below the MAGLC of 2064.5 µg/m^3. This provided compliance with air toxics.

<u>L001/EU04a Solvent tank used to clean paint line equipment</u>

This emissions unit is a solvent cleaning tank with a projected total solvent surface area of no more than 8 ft^2. This operation is used for off-line maintenance cleaning and is not a production source. The permittee estimated emissions using AP-42 Section 4.6, Solvent Degreasing, by adjusting the emission factor for a trichloroethane degreasing operation based on the difference in vapor pressure and molecular weight between the AP-42 reference solvent and the Superior R8-877 solvent used in this emissions unit. This resulted in an emission factor of 0.064 lb OC/hr/ft^2.

Based on a maximum solvent surface area of 8 ft^2, potential emissions are estimated to be 0.51 lb OC/hr, or 12.3 lb OC/day assuming continuous operation for 24 hours per day. The permittee has stated that this emissions unit will operate no more than 8 hours per day. Therefore, potential emissions are estimated to be (0.51 lb OC/hr)(8 hr/day) = 4.08 lb OC/day. The potential emissions were calculated at (0.51 lb OC/hr)(24 hr/day) = 12.24 lb OC/day, therefore would not qualify for de minimis exemption under OAC rule 3745-15-05(B). But if this emissions unit only operates for the 8 hr/day as indicated by the permittee, the emissions are less than 10 lb/day and this emissions unit qualifies for the de minimis exemption under OAC rule 3745-15-05(D) as long as the

permittee maintains daily records to demonstrate that the total daily emissions did not exceed 10 pounds per day. The facility shall maintain records of daily hours of operation to demonstrate emissions remain below 10 lb OC/day.

The SDS for Superior R8-877 states that the solvent consists of a minimum of 30% acetone and 30% acetic acid. Acetone and acetic acid are excluded from the definition of VOC and are not included in facility-wide VOC emission calculations. The remaining components consist of isopropanol, 1,2,4-trimethylbenzene, light aromatic solvent naphtha, trimethylbenzene (mixed isomers), cumene, and xylene, which are considered VOC emissions. Therefore, as a conservative estimate for facility-wide VOC calculations, 40% of the OC emissions are assumed to be VOC emissions. The potential VOC emissions would therefore be (12.24 pounds of OC per day)(365 days per year)(0.4 lb VOC/pound OC)/(2000 pounds per ton) = 0.98 tons of VOC per year.

Cumene and xylene are identified as HAPs, and each has a maximum concentration of 1% by weight according to the SDS. Therefore, for facility-wide HAP emission calculations, 1% of the OC emissions are conservatively assumed to be cumene HAP emissions and 1% of the OC emissions are conservatively assumed to be xylene HAP emissions. The xylene emissions would be (12.24 pounds of OC per day)(365 days per year)(0.01 lb xylene/pound OC)/(2000 pounds per ton) = 0.02 tons of xylene per year. The cumene emissions would be (12.24 pounds of cumene per day)(365 days per year)(0.01 lb cumene /pound OC)/(2000 pounds per ton) = 0.02 tons of cumene per year. The total HAP emissions would be the summation of xylene and cumene emissions or 0.04 tons of total HAP per year

<u>P001 – P005 70-ton bulk polypropylene bulk silos</u>

These bulk plastic silo storage vessels have integrated bin vent filters and are loaded from trucks pneumatically. The permittee states that the silos are configured so that only one silo can be loaded from a truck at any given time with a maximum transfer rate of 25,000 pounds per hour. Based on the potential throughput of the injection molding lines, the maximum loading throughput of silos would be 13,140 tons per year. The facility calculated particulate emission using an emission factor from Table 6.6.2-1 of AP-42 Section 6.6.2 Poly(ethylene Terephthalate) manufacturing 9/91 reformatted 1/95 for product storage of 0.0003 gram of PM10 per kilogram of product using a ten times safety factor. This resulted in 0.006 pound of particulate per ton of material. The controls for the storage of final product in this AP-42 do not state the method of storage. Looking at AP-42 Section 11.12 for Concrete Batching 6/06, a controlled emission factor for the pneumatic unloading of cement supplements such as aggregate is 0.0024 pounds of particulate per ton of material. This is comparable to the emission factor from AP-42 6.6.2 for product storage with a ten times safety factor of 0.003 pounds of particulate per ton of material. Therefore, this would be considered an acceptable estimate of particulate emissions.

Ohio EPA has determined that silo bin vents are not inherent controls and therefore cannot be taken into account when determining if the emissions unit qualifies for a de minimis exemption. Table 6.6.2-1 of AP-42 Section 6.6.2 states that the uncontrolled emission factor for product storage is 0.40 gram of PM10 per kilogram of product or 0.8 pounds of PM10 per tons of material. Using this emission factor, the uncontrolled particulate emissions would be (0.8 pound of particulate per ton of material)(25,000 pounds of material per hour)(24 hour/day)/(2000 pounds/ton) = 240 pounds per day. The uncontrolled annual emissions would be (0.8 pound of particulate per ton of material)(13,140 tons per year)/(2000 pounds per ton) = 5.26 tons of particulate per year. Therefore, based on this uncontrolled emission, these emissions units will need to be permitted. The facility is in the process of submitting a permit application and these will be processed concurrently.

With the emission factor proposed by the permittee of 0.006 pound of particulate per ton of material transferred and a maximum rate of transfer of 25,000 pounds or 12.5 tons of material per hour. The potential hourly particulate emissions are therefore (0.006 pound of particulate per ton of material transferred)(12.5 tons of material transferred per hour) = 0.075 pound of particulate per hour. The daily emissions would be (0.075 pound of particulate per hour)(24 hours per day) = 1.8 pounds of particulate per day. The annual emissions would be (0.006 pound of particulate per ton of material)(13,140 tons per year)/(2000 pounds per ton) = 0.04 tons of particulate per year.

P006 – P011 Pneumatically material transfer of plastic pellets from silo to day bin

The plastic pellets are conveyed to each line by a rotary valve opening into a delivery pipe. A blower downstream of the rotary valve pushes the pellets and a vacuum pump on the upstream side of the day bin pulls the pellets into the day bin(s), 6 bins, one per molding line. The outlet from each bin will have a mesh screen and ultimate filter to catch pellets and prevent any dust from reaching the vacuum pumps. The discharge from each vacuum pump is to the interior of the building. The permittee stated that the filter will emit no more than 0.03 grains per of particulate per dry standard cubic foot of exhaust gas with less than four thousand actual cubic feet per minute volume. Therefore, these emissions units qualify for a permit exemption for pneumatic conveying under OAC rule 3745-31-03(z).

P0012 – P017 EU02 polypropylene closed injection molding lines #1 - #6

This emissions unit consists of six polypropylene injection molding lines. The facility has provided calculations demonstrating that this emissions unit qualifies for a de minimis exemption under OAC rule 3745-15-05(B). Potential particulate and VOC emissions from the injection molding process are based on a maximum polypropylene usage rate of 500 pounds per hour. These emissions are below the 10 lb/day de minimis threshold.

In addition to emissions from the molding process, this emissions unit includes VOC emissions from mold maintenance products (mold cleaner and mold lubricant) applied from aerosol cans. The facility states that usage would be 4 cans per day. The permittee states that each aerosol can contains 1.0 pounds of VOC but added a 25% safety factor for 1.25 pounds of VOC per can. If the facility used more than 8 aerosol cans per day for the emissions unit the VOC emissions would exceed 10 lb/day. To support a de minimis exemption under OAC rule 3745-15-05(D), the facility shall maintain records of daily mold maintenance product usage for each injection molding line.

The emission calculations for this emissions unit are based on emission factors from Adams et al., "Development of Emission Factors for Polypropylene Processing," Journal of the Air & Waste Management Association, published December 27, 2011. The reactor-grade polypropylene homopolymer emission factors from this study were selected as representative of the facility's polypropylene injection molding process. The particulate and HAP emissions calculations also support the de minimis exemption.

The emission calculations for each injection molding machine are provided below:

	Material Throughput 500 Pounds per hour 0.17 aerosol cans/day	Material Throughput 12,000 Pounds per day 4 aerosol cans/day	Material annual Throughput 4.38 Million pounds per year 1460 aerosol cans/year
PM_{10} emissions (EF: 17.3 lbs/MMlbs)	0.009	0.21	0.04
Molding VOC (EF: 34.4 lbs/MMlbs)	0.017	0.40	0.07
Mold Maintenance (1.25 lb VOC/aerosol can)	0.21	5.0	0.91
Total VOC (molding+maintenance)	0.23	5.4	0.98
Formaldehyde HAP (EF: 0.17 lbs/MMlbs)	0.0001	0.002	0.00037
Acrolein HAP (EF: 0.01 lbs/MMlbs)	0.000005	0.00012	0.000022
Acetaldehyde HAP (EF: 0.09 lbs/MMlbs)	0.000045	0.00108	0.0002
Propionaldehyde HAP (EF: 0.02 lbs/MMlbs)	0.00001	0.00024	0.000044
Methyl Ethyl Ketone HAP (EF: 0.07 lbs/MMlbs)	0.000035	0.00084	0.00015
Total HAP (EF: 0.36 lbs/MMlbs)	0.0002	0.00432	0.00079

P018/EU04 Paint Mixing Room

This emissions unit consists of the room housing the primer, base coat, and clear coat mix tanks, recirculation and holding tanks, component (hardener and solvent) tanks, and purge solvent system tanks. All tanks and delivery systems are closed systems consisting of small-volume vessels (<100 gallons) with hard piping and no open exposure to the room environment. The paint mix and delivery systems are designed to minimize solvent losses; however, for a conservative estimate of potential emissions, emissions from the paint mix room were calculated assuming 0.1 percent of the VOC and HAP contained in the coatings and purge solvent processed through the paint line are emitted from this emissions unit. The coatings will be received and stored in sealed drums, and the purge solvent will be received in sealed totes.

Based on the maximum VOC throughput for the paint line of 159.13 pounds of VOC per hour and an emission factor of 0.001 pounds of VOC emitted from the paint mix room per pound of VOC processed through the paint line, potential VOC emissions from this emissions unit are 0.159 pounds per hour. Assuming continuous operation (24 hours per day), the potential daily VOC emissions are 3.82 pounds per day. Therefore, this emissions unit qualifies for a de minimis exemption under OAC rule 3745-15-05(D), provided the facility maintains records demonstrating emissions remain below the applicable threshold.

P019/EU06 Injection Molding Flaming Booth

Each part produced by the injection molding machines is routed through a flame treatment booth after molding and prior to coating. These flame treatment booths consist of six natural gas-fired burners rated at 0.125 MMBtu/hr each.

The permittee claimed a permit exemption under OAC rule 3745-31-03(B)(1)(b), which applies to fossil fuel- or wood-fired boilers, preheaters, air heaters, or water heaters less than one million Btu/hr, except units burning waste fuels or waste oil. Although these burners are less than one million Btu/hr, they are not boilers, preheaters, air heaters, or water heaters. The burners are used for flame treating plastic parts to prepare the surface for coating application. Therefore, the permit exemption under OAC rule 3745-31-03(B)(1)(b) does not apply.

The combined emissions from the six natural gas-fired burners are less than 10 lb/day for each evaluated air contaminant, as shown in the table below. Therefore, the emissions unit qualifies for a de minimis exemption under OAC rule 3745-15-05(B).

	PM_{10}	SO_2	NO_x	CO	VOC
AP-42 Emission Factors Section 1.4 (4/26)	7.45×10^{-3} lb/MMBtu	5.88×10^{-4} lb/MMBtu	0.098 lb/MMBtu	0.082 lb/MMBtu	5.4×10^{-3} lb/MMBtu
Emissions (lb/day)	0.02	0.0018	0.294	0.246	0.016

Emissions x6 (lb/day)	0.12	0.01	1.76	1.48	0.10
Emission (ton/yr)	0.004	0.0003	0.05	0.045	0.003
Emissions x 6 (ton/yr)	0.024	0.0018	0.15	0.27	0.018

P020/EU12 Emergency Firewater Pump

This emissions unit consists of a 327 horsepower diesel-fired reciprocating internal combustion engine used to operate an emergency firewater pump. The engine qualifies for a permit-by-rule (PBR) under OAC rule 3745-31-30(C)(2)(a) as an emergency water pump powered by a reciprocating emergency engine greater than fifty horsepower, provided the engine operates at the facility for no more than 500 hours per rolling 12-month period, burns an approved fuel, and complies with the applicable requirements of 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.

The facility shall maintain records of the fuel used, hours of operation during emergencies, hours of operation for maintenance and testing, and total hours of operation for the engine during each rolling 12-month period. The facility shall also comply with the recordkeeping, reporting, and notification requirements specified in OAC rule 3745-31-30(C)(1).

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
PM_{10}	1.38
VOC	20.91
Individual HAP	6.2
Combined HAP	8.95

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
OPmobility Exterior USA LLC

Facility ID:	0487010089
Permit Number:	P0140793
Permit Type:	Initial Installation
Issued:	08/26/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install and Operate

for

OPmobility Exterior USA LLC

Table of Contents

Authorization

Facility ID:	0487010089
Application Number(s):	A0082016A0082016
Permit Number:	P0140793
Permit Description:	This facility will manufacture and coat miscellaneous plastic parts and products for the automotive industry.
Permit Type:	Initial Installation
Permit Fee:	$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	08/26/2026
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

OPmobility Exterior USA LLC
29755 Glenwood Road
Rossford, OH 43460

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie St.
Toledo, OH 43604
(419)936-3015

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number:P0140793

Permit Description:This facility will manufacture and coat miscellaneous plastic parts and products for the automotive industry.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	EU07 Plastic Parts and Products Paint Line PL1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m3 = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH_4 = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO_2 = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m3 = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH_3 = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO_2 = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO_x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO_2 = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_4 = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m3 = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

   a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, EU07 Plastic Parts and Products Paint Line PL1

Operations, Property and/or Equipment Description:

Primer spray booth and flash-off tunnel, Base Coat spray booth and flash-off tunnel, and Clear Coat spray booth and flash-off tunnel, and the indirect heated Clear Coat drying oven for the coating of molded plastic parts

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., d)(15) through d)(18) and e)(4)

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., b)(2)b. through b)(2)g., c)(3), c)(4), d)(1), d)(2), d)(8) through d)(14), e)(1), and f)(1)a. through f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	The emission limitation established pursuant to this rule is equivalent to the VOC emission limitation established pursuant to OAC rule 3745-31-05(D).
		See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM_{10} from the coatings since the calculated annual emissions rate is less than 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).

c.	OAC rule 3745-31-05(D) (Synthetic minor for VOC and HAP to avoid TV and PSD permitting)	Volatile Organic Compound (VOC) emissions shall not exceed 20.91 tons per rolling, 12-month period.
		HAP emissions shall not exceed 6.2 tons of individual hazardous air pollutant (HAP) emissions and 8.72 tons of total combined HAP emissions per rolling, 12-month period.
		See b)(2)b. through b)(2)g.
d.	OAC rule 3745-17-07(A)	Exempted by the provisions of OAC rule 3745-17-07(A)(3)(h)
e.	OAC rule 3745-17-11(C)(1), (C)(2)	See c)(1), c)(2), and d)(3) through d)(7)
f.	ORC 3704.03(F)(4)(c) OAC rule 3745-114-01	See d)(15) through d)(18) and e)(5)
g.	OAC rule 3745-18-06(A)	See b)(2)h.

(2) Additional Terms and Conditions

a. BAT requirements under OAC rule 3745-31-05(A)(3) for the CO, NO_x, PM_{10}, SO_2, and VOC emissions from the products of combustion from this EU has resulted in no emission limitations being established for combustion products under this rule.

i. Emissions of CO, NO_x, PM_{10}, SO_2, and VOC are generated as the products of combustion from the use of natural gas in the burners. The potential emissions for the above-mentioned products of combustion are based on operation at the maximum burner firing rates for 8,760 hours per year and result in negligible emission quantities, and, therefore, have not been addressed through individual BAT limitations for natural gas combustion for these pollutants within this permit.

b. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable Cumulative Emissions of VOC

Months	Tons
1	1.8
1-2	3.6
1-3	5.4
1-4	7.2
1-5	9.0

1-6	10.8
1-7	12.6
1-8	14.4
1-9	16.2
1-10	18.0
1-11	19.8
1-12	20.91

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the VOC emissions.

c. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable Cumulative Emissions of

Individual and combined HAP

Months	Each Individual HAP (tons)	Total Combined HAP (tons)
1	0.6	0.8
1-2	1.2	1.6
1-3	1.8	2.4
1-4	2.4	3.2
1-5	3.0	4.0
1-6	3.6	4.8
1-7	4.2	5.6
1-8	4.8	6.4
1-9	5.4	7.2

1-10	6.0	8.0
1-11	6.2	8.72
1-12	6.2	8.72

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for HAPs shall be based upon a rolling, 12-month summation of the VOC emissions.

d. The permanent total enclosure shall be constructed to totally enclose the Primer spray booth and flash-off tunnel, Base Coat spray booth and flash-off tunnel, and Clear Coat spray booth and flash-off tunnel, and the indirect heated Clear Coat drying oven and route to an RTO, such that all VOC and HAP emissions are captured, contained, and directed to the control device.

e. The permanent total enclosure shall be maintained under negative pressure whenever the EU is in operation and shall be designed and maintained to have an average facial velocity (FV) of air through each natural draft opening (NDO) of at least 200 feet per minute (fpm) (3,600 meters per hour (m/h)). Compliance with the average FV shall be demonstrated during the compliance test by either using an air flow monitor or a differential pressure gauge at each NDO and maintaining the required FV or the corresponding negative pressure. The permanent total enclosure shall meet all the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any NDO shall be at least four equivalent opening diameters (EDs), or four times the diameter of the opening, from each VOC emitting point. An ED is the diameter of a circle that has the same area as the opening. For a circular or oval type opening, the ED is calculated using the following equation:

$ED = (4\ area/\pi)^{0.5}$

For a square or rectangular type opening, the ED is calculated using either the circular/oval equation above or the following equation:

$ED = (2)(Length)(Width) / (Length + Width)$

ii. The total area of all NDOs (A_N) shall not exceed 5% of the total surface area of the enclosure (A_T), that is, the four walls, floor, and ceiling. The NDO to enclosure area ratio (NEAR) is calculated as follows:

$NEAR = A_N / A_T$

iii. The direction of air flow through all NDOs shall be into the enclosure, with an average FV of no less than 200 fpm (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 inches of water).

iv. All access doors and windows to the enclosure that do not meet the requirements of an NDO and whose surface areas are not included in the 5% surface area determination in "ii", shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

f. The permanent total enclosure serving this EU shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all the VOC and HAP emissions from this EU.

g. All of the captured VOC and HAP emissions from this EU shall be vented to an RTO that achieves a minimum overall control efficiency of 97% for VOC and HAPs and shall meet the monitoring and recordkeeping requirements of this permit, when the EU is operating.

h. OAC rule 3745-18-06(A) does not establish SO_2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permanent total enclosure shall be maintained under negative pressure, with an average FV at each NDO of 200 fpm (3,600 m/h) or greater, whenever the EU is in operation.

(4) The permanent total enclosure shall be maintained under negative pressure whenever the EU is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each NDO to be into the enclosure.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record monthly the following information for the coating operation:

a. The name and identification number/code of each coating, purge solvent and reduction solvent employed, as applied for this emissions unit;

b. the number of gallons per month of each coating, purge solvent and reduction solvent employed, as applied;

c. the VOC content of each coating, purge solvent and reduction solvent employed, in pounds per gallon as applied;

d. the total controlled VOC emission rate, in tons per month, from all coating, purge solvent and reduction solvent [summation of "b." multiplied by "c." for each coating, purge solvent and reduction solvent, divided by 2000 pounds per ton, then multiplied by (one, minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the EU was in compliance)];

e. the total controlled VOC emission rate, as a rolling, 12-month summation, in tons, for all coatings, purge solvents and reduction solvents [calculated by summing the current month's total VOC emission rate in tons per month from "d." above to the total VOC emission rate for the preceding eleven calendar months in tons per month];

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

(2) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in this EU for purposes of determining compliance with the 6.2 tons per rolling, 12-month period for any individual HAP and 8.72 tons per rolling, 12-month period for total combined HAPs emissions limitations:

a. The name and identification number/code of each coating, purge solvent and reduction solvent employed, as applied for this emissions unit;

b. the weight fraction of each individual HAP contained in each material applied (and identified in a. above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;

c. the number of gallons of each coating, purge solvent and reduction solvent employed, as applied, during the month identified in a. above;

d. the density of each coating, purge solvent and reduction solvent employed and identified in a. above, in pound(s) per gallon;

e. for each coating operation subject to a control, calculate the total monthly emissions for each individual HAP, i.e. the products of "b." times "c." times "d." times (1 minus the overall control efficiency of the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance) for each HAP in each coating;

f. for each individual HAP, the sum of the calculated emission rate from all the coating, purge solvent and reduction solvents employed during the month, in ton(s), i.e., the summation of the individual HAP emission rates calculated in "e." above;

g. for combined HAPs, the calculated total combined HAPs emission rate from all the coatings, purge solvents and reduction solvents employed during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates, calculated in "f." above;

h. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "f." above, for the present month plus the previous 11 months of operation, in ton(s); and

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP for each calendar month.

i. the calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "g." above, for the present month plus the previous 11 months of operation, in ton(s).

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative combined HAP emissions for each calendar month.

[1]A listing of the HAPs can be found in Section 112(b) of the CAA, as revised under 40 CFR Part 63 Subpart C, or can be obtained by contacting your Ohio EPA DO/LAA contact. MSDSs typically include a listing of the solvents contained in the coatings and cleanup materials.

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(8) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. The measured diameter of each NDO;

b. The distance measured from each NDO to each VOC emitting point;

c. The total calculated surface area of all NDOs and the surface area of the enclosure's four walls, floor, and ceiling;

d. The calculation or demonstration that the distance from each VOC emitting point to each NDO is at least four times the diameter of the opening; and

a. The calculation demonstrating that the sum of the surface areas of all the NDOs to the enclosure is not more than 5% of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

(9) The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not NDOs are closed, and that the direction of air at each NDO is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Using a portable air flow meter, the permittee shall perform weekly FV checks at each NDO to the permanent total enclosure, to determine if the average FV at each opening is maintained at 200 fpm or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements and shall include any corrective actions taken by the permittee.

(10) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable combustion temperature within the RTO, during any period of time when the EU controlled by the RTO is operating, shall not be more than 50°F below the average temperature measured during the most recent performance test that demonstrated the EU was in compliance. Until performance testing has been conducted, the RTO shall be operated and maintained per the manufacturer's recommendations, instructions and the operating manual.

(11) A log (date and total time) of the downtime or bypass of the capture (collection) system and RTO and/or downtime of the monitoring equipment, when the associated EU was operating.

(12) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the RTO when the EU is operating, including periods of startup and shutdown. The permittee shall record the combustion temperature on an hourly basis. The monitoring equipment shall be installed, calibrated, operated and maintained per the manufacturer's recommendations, instructions,

and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature limit is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than five years.

(13) Whenever the monitored average combustion temperature within the RTO deviates from the limit established per this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

(14) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The temperature readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(15) The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA DO/LAA. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emissions rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(16) The FEPTIO application for EU K001 was evaluated based on the actual materials and the design parameters of the EU's exhaust system(s), as specified by the permittee. The *Toxic Air*

Contaminant Statute, ORC 3704.03(F), was applied to this EU for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:

a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EU (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices and in the following order of preference:

   i. TLV shall be used, if the chemical is listed; or

   ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.

b. The TLV is divided by 10 to adjust the standard from the working population to the general public.

c. This standard is adjusted to account for the duration of the exposure or the operating hours of the **EU/EUs**, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.

d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4\frac{TLV}{XY} = MAGLC$$

e. The following summarizes the results of dispersion modeling for the significant toxic **contaminant(s)** (emitted at 1 TPY or more) or *worst-case* scenario:

   i. Toxic Contaminant: xylene

   TLV (mg/m^3): 86.71

   Maximum Hourly Emissions Rate (lb/hr): 1.55

   Predicted One-Hour Maximum Ground-Level Concentration (µg/m^3): 43.21

   MAGLC (µg/m^3): 2064.5

The permittee has demonstrated that emissions of xylene, from **EU/EUs** K001, are calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

(17) Prior to making any physical changes to or changes in the method of operation of the **EU/EUs** that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the

MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:

a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.

c. Physical changes to the **EU/EUs** or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute,* ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F),* has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the **EU/EUs** described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(18) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):

a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).

b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the **EU/EUs** to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.

d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the **EU/EUs** or the materials applied.

(19) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The

record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:

i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. Any exceedance of the rolling, 12-month summation of the monthly emissions limit of VOC, individual HAP or combined HAP; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emissions of VOC, individual HAP or combined HAP**;**

iii. Each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the limit specified by the manufacturer and/or outside of the acceptable limit following any required compliance demonstration;

iv. Any period of time (start time and date, and end time and date) when the EU was operating, and the captured process emissions were not vented to the RTO;

v. Each incident of deviation described in "iii" or "iv" above where a prompt investigation was not conducted;

vi. Each incident of deviation described in "iii" or "iv" above where prompt corrective action, that would bring the EU(s) into compliance and/or the temperature within the RTO into compliance with the acceptable limit, was determined to be necessary and was not taken; and

vii. Each incident of deviation described in "iii" or "iv" above where proper records were not maintained for the investigation and/or the corrective action(s).

b. The probable cause of each deviation (excursion).

c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).

d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October

31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

(2) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification, or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual PER the following information during the 12-month reporting period for this EU:

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

(5) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute,* ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, **EU/EUs** or the exhaust **stack(s)** have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation</u>

20.91 tons of VOC per rolling, 12-month period

<u>Applicable Compliance Method</u>

Compliance with this emissions limit shall be demonstrated by the record keeping requirement under d)(1).

b. <u>Emissions Limitation</u>

6.2 tons per year of each individual HAP and 8.72 tons of total combined HAP, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance with this emissions limit shall be demonstrated by the record keeping requirement under d)(2).

c. Emissions Limitation

100% capture of VOC and HAP emissions

Applicable Compliance Method

The permittee shall conduct, or have conducted, emissions testing for this EU in accordance with the following requirements:

a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the EU will be operated, but not later than 180 days after initial startup of such EU

b. The emissions testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure. The following test methods shall be employed:

   i. Method 204 from 40 CFR Part 51 Appendix M; and

   ii. Method 2 from 40 CFR Part 60, Appendix A.

c. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average FV of the air flow through each NDO.

d. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the *enclosure* through a forced makeup air duct, using Method 2. The FV shall be calculated using the following equation:

e. If the average FV is measured at greater than 500 fpm (9,000 m/h), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average FV is measured at less than 500 fpm, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of one hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered NDOs shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

f. The permittee shall also measure and record the following information for the permanent total enclosure and each NDO:

i. The diameter of each NDO;

ii. The distance measured from each NDO to each VOC emitting point in the process;

iii. The distance measured from each exhaust duct or hood in the enclosure to each NDO;

iv. The total surface area of each NDO and the surface area of the enclosure's four walls, floor, and ceiling; and

v. The ratio of the total surface area (sum) of all NDOs to the total surface area of the permanent total enclosure.

g. The testing shall be conducted while the EU is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA.

h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an intent to test (ITT) notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 Ohio EPA's refusal to accept the results of the emissions test(s).

i. Personnel from the appropriate Ohio EPA DO/LAA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

j. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA 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 Ohio EPA.

d. Emissions Limitation

97% reduction of VOC emissions and HAPs emissions by incineration

Applicable Compliance Method

Compliance shall be demonstrated through the required record keeping specified in d). Compliance with the overall control efficiency shall be determined in accordance with USEPA Methods 25 or 25A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used upon approval by Toledo Environmental Services.

(2) The permittee shall conduct, or have conducted, emissions testing for this EU per the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the EU will be operated, but not later than 180 days after initial startup of the EU;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOC;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s):

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

d. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under *worst case* conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe *worst case* operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute *worst case*. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 DO/LAA's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA DO/LAA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within 30 days following completion of the test(s). The permittee may request

additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA DO/LAA.

g) Miscellaneous Requirements

(1) None.