



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/14/2013

Marshall Searles  
Forest City Technologies, Plant 4  
299 Clay Street  
P.O. Box 86  
Wellington, OH 44090-0086

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0247170841  
Permit Number: P0112074  
Permit Type: Renewal  
County: Lorain

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Forest City Technologies, Plant 4**

Facility ID:	0247170841
Permit Number:	P0112074
Permit Type:	Renewal
Issued:	6/14/2013
Effective:	6/14/2013
Expiration:	8/27/2017





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Forest City Technologies, Plant 4

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**Final Permit-to-Install and Operate**  
Forest City Technologies, Plant 4  
**Permit Number:** P0112074  
**Facility ID:** 0247170841  
**Effective Date:** 6/14/2013

## Authorization

Facility ID: 0247170841  
Application Number(s): A0046170  
Permit Number: P0112074  
Permit Description: FEPTIO renewal permit for coating lines  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 6/14/2013  
Effective Date: 6/14/2013  
Expiration Date: 8/27/2017  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Forest City Technologies, Plant 4  
401 Magyar Street  
P.O. Box 86  
Wellington, OH 44090-0086

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0112074  
 Permit Description: FEPTIO renewal permit for coating lines

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

<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Dip Spin Unit #2 with drying oven
Superseded Permit Number:	P0110600
General Permit Category and Type:	Not Applicable

**Group Name: 3.0 lb VOC/gal no cleanup**

<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Stream Coater #2 (STR-2) & OV-178
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	Dip Spin Unit #1 (DS)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Stream Coating Line #5 (STR-5)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K014</b>
Company Equipment ID:	BC-11 & OV-203
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K015</b>
Company Equipment ID:	IC-1 & OV-26
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K016</b>
Company Equipment ID:	P-4 & OV-214
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K017</b>
Company Equipment ID:	P-14 & OV-15
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K018</b>
Company Equipment ID:	OV-9 & Coater
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K019</b>
Company Equipment ID:	OV-163 & Coater
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>K020</b>
Company Equipment ID:	BC-2 & OV-12
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K021</b>
Company Equipment ID:	BC-4 & OV-14
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K022</b>
Company Equipment ID:	BC-3 & OV-13
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K023</b>
Company Equipment ID:	Bolt Coater #5 (BC-5)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K024</b>
Company Equipment ID:	Bolt Coater #6 (BC-6)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K025</b>
Company Equipment ID:	Index Coater #2
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K026</b>
Company Equipment ID:	Index Coater #7
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K028</b>
Company Equipment ID:	Thread Coater #2 with Vision (TV-2)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K029</b>
Company Equipment ID:	Automatic Nut Coater #5 (ANC-5)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K030</b>
Company Equipment ID:	Automatic Nut Coater #5 (ANC-6)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K031</b>
Company Equipment ID:	Plug Coater Line #1 (P-1)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K032</b>
Company Equipment ID:	P-5 & OV-33
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K033</b>
Company Equipment ID:	P-6 & OV-34
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K034</b>
Company Equipment ID:	BC-13 & OV-16
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Forest City Technologies, Plant 4  
**Permit Number:** P0112074  
**Facility ID:** 0247170841  
**Effective Date:** 6/14/2013

<b>Emissions Unit ID:</b>	<b>K036</b>
Company Equipment ID:	P-16 & OV-209
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K037</b>
Company Equipment ID:	BC-12 & OV-11
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K051</b>
Company Equipment ID:	Dip Spin Unit #3 (DS-3 Line)
Superseded Permit Number:	P0085532
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Forest City Technologies, Plant 4  
**Permit Number:** P0112074  
**Facility ID:** 0247170841  
**Effective Date:** 6/14/2013

## **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:

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.

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 (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 by up to 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 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 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 Ohio EPA DAPC, Northeast District Office 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 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<sup>1</sup> 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 emissions 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 shutdown 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.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**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, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must 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.



**Final Permit-to-Install and Operate**  
Forest City Technologies, Plant 4  
**Permit Number:** P0112074  
**Facility ID:** 0247170841  
**Effective Date:** 6/14/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Forest City Technologies, Plant 4

**Permit Number:** P0112074

**Facility ID:** 0247170841

**Effective Date:** 6/14/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions 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 permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
Forest City Technologies, Plant 4  
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**Effective Date:** 6/14/2013

## **C. Emissions Unit Terms and Conditions**



**1. K010, Dip Spin Unit #2 with drying oven**

**Operations, Property and/or Equipment Description:**

Dip spin coater line number 2 (DS-2)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)c, b)(2)d, and c)(2).

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.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed 20.31 pounds per day.  VOC emissions shall not exceed 2.5 tons per year.  See Section b)(2)a below.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See Section b)(2)b below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	Coating usage shall not exceed 3 gallons per day.
d.	OAC rule 3745-31-05(D)	See Sections b)(2)c, b)(2)d, and c)(2) below.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.

- c. The emissions of each single hazardous air pollutant (HAP) from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of single HAP emissions upon issuance of this permit.

- d. The emissions of combined HAPs from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of combined HAP emissions upon issuance of this permit.

c) Operational Restrictions

- (1) The maximum daily coating usage for this emissions unit shall not exceed 3 gallons.
- (2) The maximum annual volatile organic material usage from coatings and cleanup materials from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not cause volatile organic compound emissions to exceed 99.5 tons, based upon a rolling, 12-month summation.



This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of volatile organic compound emissions upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each day for the coating line:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed; and
  - c. the total volume, in gallons, of all the coatings employed.
- (2) The permittee shall collect and record the following information for each day:
  - a. the name and identification number of each coating and cleanup material, as applied;
  - b. the volume, in gallons, of each coating and cleanup material, as applied;
  - c. the VOC content of each coating and cleanup material, as applied, in pounds per gallon; and
  - d. the total VOC emissions from all coatings and cleanup materials employed [summation of (b x c) for all coatings and cleanup materials], in pounds.
- (3) The permittee shall collect and record the following information each month:
  - a. For all coating lines at the facility, including all de minimis and exempt coating lines:
    - i. The name and identification number of each coating, as applied;
    - ii. The volume in gallons of each coating, as applied;
    - iii. The individual HAP content for each HAP in each coating, as applied, in pounds per gallon; and
    - iv. The total HAP emissions for all coating lines of each single HAP [summation of (ii x iii) for all coatings; for coating lines with control equipment (ii x iii) shall be multiplied by the overall control efficiency determined during the most recent emission test that demonstrated that the source was in compliance or (1 - 0.90) until such time the overall control efficiency is established and added to the total sum of HAP emissions].
  - b. For all combustion sources of HAPs at the facility:
    - i. The total volume of natural gas burned; and





- (2) The permittee shall submit deviation (excursion) reports that identify each day during which the daily VOC emission rate exceeded 20.31 pounds per day for this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.
  - (3) The permittee shall submit annual reports that specify the actual annual VOC emissions (from coatings and cleanup materials) for this emissions unit. The reports shall be submitted by January 31 of each year and cover the previous calendar year.
  - (4) The permittee shall submit annual reports which summarize the facility-wide emissions of each single HAP and combined HAPs from all emissions units at the facility. The reports shall include emissions calculations, be submitted by January 31 of each year, and cover the previous calendar year.
  - (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (6) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.9 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.
  - (7) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.
  - (8) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month material usage from all emissions units at the facility caused the facility to exceed the VOC emission limitation of 99.5 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.
- 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. **Emission Limitation:**

VOC emissions shall not exceed 20.31 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).



b. Emission Limitation:

VOC emissions shall not exceed 2.5 tons per year, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon a summation of the daily VOC emissions recorded in d)(2)d for each day of the calendar year, divided by 2000 pounds per ton.

c. Operational Restriction:

Coating usage shall not exceed 3 gallons per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

d. Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section d)(3) of these terms and conditions.

e. Emission Limitation:

The emissions of combined HAPs from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section d)(3) of these terms and conditions.

f. Emission Limitation:

The maximum annual volatile organic material usage from coatings and cleanup materials from all emissions units that apply coatings and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not cause volatile organic compound emissions to exceed 99.5 tons, based upon a rolling, 12-month summation.



Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section d)(4) of these terms and conditions.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group -3.0 lb VOC/gal no cleanup:  
 K007,K009,K011,K014,K015,K016,K017,K018,K019,K020,K021,K022,K023,K024,K025,K026,K028,  
 K029,K030,K031,K032,K033,K034,K036,K037,K051,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K007	Stream coater number 2 (STR-2)
K009	Dip spin line number 1 (DS-1)
K011	Stream coating line number STR-5
K014	Bolt coater no. 11 with natural gas drying oven no. 203
K015	Index coater no. 1 with natural gas drying oven no. 26
K016	Plug coater no. 4 with natural gas drying oven no. 214
K017	Plug coater no. 14 with natural gas drying oven no. 15
K018	Optional coater with natural gas drying oven no. 9
K019	Optional coater with natural gas drying oven no. 163
K020	Bolt coater no. 2 with natural gas drying oven no. 12
K021	Bolt coater no. 4 with natural gas drying oven no. 14
K022	Bolt coater no. 3 with natural gas drying oven no. 13
K023	Bolt coater no. 5 with natural gas drying oven no. 15B
K024	Bolt coater no. 6 with natural gas drying oven no. 4
K025	Index coater no. 2 with natural gas drying oven no. 5
K026	Index coater no. 7 with natural gas drying oven no. 21
K028	Vision coater no. 2 with natural gas drying oven no. 179
K029	Auto nut coater no. 5 with natural gas drying oven no. 159
K030	Auto nut coater no. 6 with natural gas drying oven no. 19
K031	Plug coater no. 1 with natural gas drying oven no. 208
K032	Plug coater no. 5 with natural gas drying oven no. 33
K033	Plug coater no. 6 with natural gas drying oven no. 34
K034	Plug coater no. 11 with natural gas drying oven no. 16
K036	Plug coater no. 16 with natural gas drying oven no. 209
K037	K037 - Bolt Coater no. 12 with natural gas drying oven no. 11
K051	Dip-spin coating line number 3 with natural gas-fired oven

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(4), d)(5), d)(6), d)(7), and e)(9).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)c and b)(2)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.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed the pounds per day and tons per year emission limitations specified in b)(2)a.  This rule also includes the requirements of OAC rule 3745-21-09(U)(1)(i) and OAC rule 3745-31-05(D).  See b)(2)b below.
b.	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds VOC per gallon of coating, excluding water and exempt solvents.
c.	OAC rule 3745-31-05(D)	See b)(2)c and b)(2)d below.
d.	ORC 3704.03(F)(4)	See d)(4), d)(5), d)(6), d)(7), and e)(9) below.

(2) Additional Terms and Conditions

- a. VOC emissions shall not exceed the pounds per day and tons per year emission limitations specified below:

EU ID	Equipment Description	lbs VOC/day	TPY of VOC
K007	Stream coating line number STR-2	36	6.6
K009	Dip spin line number 1 (DS-1)	62	11.3
K011	Stream coating line number STR-5	43.8	8.0
K014	Bolt coater no. 11 with natural gas drying oven no. 203	21.12	3.9
K015	Index coater no. 1 with natural gas drying oven no. 26	24.64	4.5
K016	Plug coater no. 4 with natural gas drying oven no. 214	15.84	2.9
K017	Plug coater no. 14 with natural gas drying oven no. 15	21.12	3.9
K018	Optional coater with natural gas drying oven no. 9	8.8	1.6
K019	Optional coater with natural gas drying oven no. 163	8.8	1.6



EU ID	Equipment Description	lbs VOC/day	TPY of VOC
K020	Bolt coater no. 2 with natural gas drying oven no. 12	21.12	3.9
K021	Bolt coater no. 4 with natural gas drying oven no. 14	31.7	5.8
K022	Bolt coater no. 3 with natural gas drying oven no. 13	16.4	3.0
K023	Bolt coater no. 5 with natural gas drying oven no. 15B	21.12	3.9
K024	Bolt coater no. 6 with natural gas drying oven no. 4	15.84	2.9
K025	Index coater no. 2 with natural gas drying oven no. 5	31.7	5.8
K026	Index coater no. 7 with natural gas drying oven no. 21	24.64	4.5
K028	Vision coater no. 2 with natural gas drying oven no. 179	13.2	2.4
K029	Auto nut coater no. 5 with natural gas drying oven no. 159	11.44	2.1
K030	Auto nut coater no. 6 with natural gas drying oven no. 19	11.44	2.1
K031	Plug coater no. 1 with natural gas drying oven no. 208	21.12	3.9
K032	Plug coater no. 5 with natural gas drying oven no. 33	15.84	2.9
K033	Plug coater no. 6 with natural gas drying oven no. 34	17.6	3.2
K034	Bolt coater no. 13 with natural gas drying oven no. 16	15.84	2.9
K036	Plug coater no. 16 with natural gas drying oven no. 209	21.12	3.9
K037	Bolt coater no. 12 with natural gas drying oven no. 11	21.1	3.9
K051	Dip-spin coating line number 3 with natural gas-fired oven	35.5	6.5

- b. Based upon the permittee's application, there are no cleanup materials associated with this emissions unit.
- c. The emissions of each single hazardous air pollutant (HAP) from emissions units K007, K009, K010, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037, K051, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.



This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of single HAP emissions upon issuance of this permit.

- d. The emissions of the combined HAPs from emissions units K007, K009, K010, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037, K051, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of combined HAP emissions upon issuance of this permit.

c) **Operational Restrictions**

- (1) The maximum annual volatile organic material usage from coatings and cleanup materials from emissions units K007, K009, K010, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K036, K037, K050, K051, K052, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not cause volatile organic compound emissions to exceed 99.5 tons, based upon a rolling, 12-month summation.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate rolling, 12-month summations of volatile organic compound emissions upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each day for this coating line:
  - a. The name and identification number of each coating, as applied;
  - b. The volume, in gallons, of each coating, as applied;
  - c. The VOC content of each coating, as applied, in pounds per gallon;
  - d. The total VOC emissions from all coatings employed [summation of (b x c) for all coatings]; and
  - e. The VOC content of each coating, excluding water and exempt solvents, in pounds per gallon.
- (2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for this coating line:
  - a. The total VOC emissions from all coatings employed [summation of d)(1)d above for each month], in pounds or tons.



- (3) The permittee shall collect and record the following information each month:
- a. For all coating lines at the facility as denoted in b)(2)c and b)(2)d above, including all de minimis and exempt coating lines:
    - i. The name and identification number of each coating, as applied;
    - ii. The volume, in gallons, of each coating, as applied;
    - iii. The individual HAP content for each HAP in each coating, as applied, in pounds per gallon;
    - iv. The combined HAP contents for each HAP in each coating, as applied, in pounds per gallon;
    - v. The total HAP emissions for all coating lines of each single HAP [summation of (ii x iii) for all coatings]; and
    - vi. The total combined HAP emissions for all coating lines [summation of (ii x iv) for all HAPs emitted from all coating lines].
  - b. For all combustion sources of HAPs at the facility as denoted in b)(2)c and b)(2)d above:
    - i. The total volume of natural gas burned; and
    - ii. The total HAP emissions calculated using emission factors from AP-42, Section 1.4, 7/98 or any later edition.
  - c. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of d)(3)a.vi for all HAPs emitted by the coating lines (single HAP and combined HAPs, respectively) and d)(3)b.ii for all HAP emissions from combustion sources] per rolling, 12-month period.
- (4) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K009, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037, and K051, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the 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 8-hour workday and a 40-hour workweek, for each toxic



compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

K009

Toxic Contaminant: 2-butoxyethanol

TLV (ug/m3): 97,100

Maximum Hourly Emission Rate (lbs/hr): 0.39

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 237

MAGLC (ug/m3): 2300

K011

Toxic Contaminant: 2-butoxyethanol

TLV (ug/m3): 121,100

Maximum Hourly Emission Rate (lbs/hr): 0.85



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 338

MAGLC (ug/m3): 2881

Toxic Contaminant: SEC-butyl alcohol

TLV (ug/m3): 305,000

Maximum Hourly Emission Rate (lbs/hr): 0.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 322

MAGLC (ug/m3): 7262

K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025,  
K026, K028, K029, K030, K031, K032, K033, K034, K036

Toxic Contaminant: butyl cellosolve

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (g/s): 1.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1735.7

MAGLC (ug/m3): 2880

Toxic Contaminant: N-butanol

TLV (ug/m3): 112,000

Maximum Hourly Emission Rate (g/s): 1.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1735.7

MAGLC (ug/m3): 2660

K037

Toxic Contaminant: butyl cellosolve

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (g/s): 0.046

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 192.9

MAGLC (ug/m3): 2880

Toxic Contaminant: N-butanol

TLV (ug/m3): 112,000



Maximum Hourly Emission Rate (g/s): 0.046

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 192.9

MAGLC (ug/m3): 2660

K051

Toxic Contaminant: butyl cellosolve

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (g/s): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 928.5

MAGLC (ug/m3): 2880

Toxic Contaminant: N-butanol

TLV (ug/m3): 112,000

Maximum Hourly Emission Rate (g/s): 0.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 611.9

MAGLC (ug/m3): 2660

Toxic Contaminant: diethylene glycol

TLV (ug/m3): 166,000

Maximum Hourly Emission Rate (g/s): 0.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 553.9

MAGLC (ug/m3): 3950

Toxic Contaminant: secbutyl alcohol

TLV (ug/m3): 303,000

Maximum Hourly Emission Rate (g/s): 0.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 163.5

MAGLC (ug/m3): 7220

The permittee, has demonstrated that emissions of the individual toxic contaminant(s) modeled, pursuant to OAC 3745-114-01, from emissions unit(s) K009, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037 and K051, are calculated to be less



than eighty per cent of the maximum acceptable ground level concentration (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).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-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 emission of a new toxic air contaminant with a lower Threshold Limit Value (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; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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 the change(s) meet(s) 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 emissions unit, 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.

- (6) 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 (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);



- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) 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; and
  - 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 emissions unit(s) or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-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 notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of non-complying coatings (VOC content greater than 3.0 pounds VOC per gallon, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.
  - (2) The permittee shall submit deviation (excursion) reports which identify each day where the daily VOC emission rate exceeded the pounds per day limit for each emissions unit in b)(2)a, and the actual VOC emissions for each emissions unit for each such day. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.
  - (3) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.9 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each month.
  - (4) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.
  - (5) The permittee shall submit annual reports which specify the actual annual VOC emissions for each emissions unit. The reports shall be submitted by January 31 of each year and cover the previous calendar year.
  - (6) The permittee shall submit annual reports which summarize the facility-wide emissions of each single HAP and combined HAPs from all emissions units at the facility. The reports shall include emissions calculations, be submitted by January 31 of each year, and cover the previous calendar year.



- (7) The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month material usage from all emissions units at the facility caused the facility to exceed the VOC emission limitation of 99.5 tons per year, and the actual rolling, 12-month emissions of VOCs for each such month.
- (8) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (9) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack 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. Emission Limitations:

<b>EU ID</b>	<b>Equipment Description</b>	<b>lbs VOC/day</b>	<b>TPY of VOC</b>
K007	Stream coating line number STR-2	36	6.6
K009	Dip spin line number 1 (DS-1)	62	11.3
K011	Stream coating line number STR-5	43.8	8.0
K014	Bolt coater no. 11 with natural gas drying oven no. 203	21.12	3.9
K015	Index coater no. 1 with natural gas drying oven no. 26	24.64	4.5
K016	Plug coater no. 4 with natural gas drying oven no. 214	15.84	2.9
K017	Plug coater no. 14 with natural gas drying oven no. 15	21.12	3.9
K018	Optional coater with natural gas drying oven no. 9	8.8	1.6
K019	Optional coater with natural gas drying oven no. 163	8.8	1.6
K020	Bolt coater no. 2 with natural gas drying oven no. 12	21.12	3.9
K021	Bolt coater no. 4 with natural gas	31.7	5.8



EU ID	Equipment Description	lbs VOC/day	TPY of VOC
K022	drying oven no. 14 Bolt coater no. 3 with natural gas	16.4	3.0
K023	drying oven no. 13 Bolt coater no. 5 with natural gas	21.12	3.9
K024	drying oven no. 15B Bolt coater no. 6 with natural gas	15.84	2.9
K025	drying oven no. 4 Index coater no. 2 with natural gas	31.7	5.8
K026	drying oven no. 5 Index coater no. 7 with natural gas	24.64	4.5
K028	drying oven no. 21 Vision coater no. 2 with natural gas	13.2	2.4
K029	drying oven no. 179 Auto nut coater no. 5 with natural gas	11.44	2.1
K030	drying oven no. 159 Auto nut coater no. 6 with natural gas	11.44	2.1
K031	drying oven no. 19 Plug coater no. 1 with natural gas	21.12	3.9
K032	drying oven no. 208 Plug coater no. 5 with natural gas	15.84	2.9
K033	drying oven no. 33 Plug coater no. 6 with natural gas	17.6	3.2
K034	drying oven no. 34 Bolt coater no. 13 with natural gas	15.84	2.9
K036	drying oven no. 16 Plug coater no. 16 with natural gas	21.12	3.9
K037	drying oven no. 209 Bolt coater no. 12 with natural gas	21.1	3.9
K051	drying oven no. 11 Dip-spin coating line number 3 with natural gas-fired oven	35.5	6.5

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2) of these terms and conditions.

b. Emission Limitation:

3.0 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions and the testing requirements in f)(2).



c. Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K007, K009, K010, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037, K051, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3) of these terms and conditions.

d. Emission Limitation:

The emissions of the combined HAPs from emissions units K007, K009, K010, K011, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K028, K029, K030, K031, K032, K033, K034, K036, K037, K051, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3) of these terms and conditions.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

- (1) None.