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

7/25/2013

Certified Mail

No	TOXIC REVIEW
No	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

Robin Cummings
Six C Fabrication, Inc.
P.O. Box 1008
Ravenna, OH 44266

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

Facility ID: 1667070022
Permit Number: P0114849
Permit Type: Initial Installation
County: Portage

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 (EPA) Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. 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:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. 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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE
7/25/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Six C Fabrication, Inc.
5245 South Prospect Street,
Rootstown, OH 44266
Portage County
FACILITY DESC.: Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
PERMIT #: P0114849
PERMIT TYPE: Initial Installation
PERMIT DESC: Installation FEPTIO for two paint spray booths used to coat miscellaneous metal parts fabricated for the oil and gas industry.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Duane LaClair, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:Six C Fabrication, Inc. has requested a Federally Enforceable Permit to Install and Operate (FEPTIO) for the following emissions units (EU) at its facility located at 5245 South Prospect Street in Rootstown, Ohio:

EU ID	Operations, Property and/or Equipment Description
K001	Kayco spray booth #1 (primer application) with filtration for particulate control and a gas-fired drying oven (3.0 MMBtu/hr).
K002	Garmat spray booth #2 (top coat application) with filtration for particulate control and two gas-fired drying ovens (0.97 MMBtu/hr each).

3. Facility Emissions and Attainment Status: Some of the coating materials used in the facility's manufacturing process contain ingredients which are listed as hazardous air pollutants (HAPs) under Section 112(b) of the Clean Air Act. Other air contaminants emitted from these sources are particulate matter (PM) and volatile organic compounds (VOC). The facility is located in Portage County, which is in attainment for all criteria air pollutants, except particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$).

4. Source Emissions:The permittee has agreed to federally enforceable annual HAP emission limitations in order to avoid Title V permitting status and 40 CFR Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. Facility-wide emissions shall not exceed 2.5 tons of any individual HAP per year and 4.0 tons of combined HAPs per year, based upon a rolling, 12-month summation of the monthly emissions.U.S. EPA does not allow the use of annual emission limitations alone, to restrict the potential to emit; they require a process variable such as coating usage, hours of operation, or production rate to also be restricted. Terms are included in this permit, which require the facility to record the process variables used to calculate the emissions (e.g., the HAP content of all coating and cleanup material, the amount of each material used, and the subsequent calculation of emissions to document compliance with these emission limitations).

5. Conclusion: Compliance with the rolling, 12-month HAP emission limitations, in accordance with the associated permit monitoring, recordkeeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to HAP emissions. Issuance of FEPTIO #P0114849 is recommended.

6. Please provide additional notes or comments as necessary:

   None.

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

Pollutant	Tons Per Year
VOC	33.9
Combined HAPs	4.0
Individual HAP	2.5

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Six C Fabrication, Inc.

Facility ID:	1667070022
Permit Number:	P0114849
Permit Type:	Initial Installation
Issued:	7/25/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Six C Fabrication, Inc.

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Authorization

Facility ID:	1667070022
Application Number(s):	A0047950, A0048100
Permit Number:	P0114849
Permit Description:	Installation FEPTIO for two paint spray booths used to coat miscellaneous metal parts fabricated for the oil and gas industry.
Permit Type:	Initial Installation
Permit Fee:	$800.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	7/25/2013
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 to:

Six C Fabrication, Inc.
5245 South Prospect Street
Rootstown, OH 44266

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0114849
Permit Description: Installation FEPTIO for two paint spray booths used to coat miscellaneous metal parts fabricated for the oil and gas industry.

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

Group Name: Spray Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Booth 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

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 Akron Regional Air Quality Management District 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[1] 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.

[1] 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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Spray Booths: K001, K002

EU ID	Operations, Property and/or Equipment Description
K001	Kaycospray booth #1 (primer application) with filtration for particulate control and a gas-fired drying oven (3.0 MMBtu/hr).
K002	Garmatspray booth #2 (top coat application) with filtration for particulate control and two gas-fired drying ovens (0.97 MMBtu/hr each).

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. All.

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) ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed the following: 85.4 pounds per day and 15.6 tons per year for emissions unit K001; and 100.1 pounds per day and 18.3 tons per year for emissions unit K002.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Combined annual coating and cleanup input usage rates* and combined annual emissions from all the facility emissions units (K001 and K002) shall not exceed the following as rolling, 12-month summations: 2.5 tons of any individual hazardous air pollutant (HAP); and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		4.0 tons of combined HAPs. See b)(2)a. and b)(2)b. *Annual VOC/HAP input rates are equivalent to annual VOC/HAP emission rates and are based upon 100% of the solvent in the coating and cleanup materials being emitted.
c.	OAC rule 3745-21-09(U)(1)	The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents.
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(3) through d)(7).
e.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(8) through d)(11) and e)(5).

(2) Additional Terms and Conditions

a. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs [as identified in Section 112(b) of Title III of the Clean Air Act] from this facility shall not exceed 2.5 tons per year for any single HAP and 4.0 tons per year for any combination of HAPs, based upon rolling, 12-month summations.

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:

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAP (Tons)	Maximum Allowable Cumulative Emissions of Combined HAP (Tons)
1	0.62	1.00
1-2	0.62	1.00
1-3	0.62	1.00
1-4	1.25	2.00
1-5	1.25	2.00
1-6	1.25	2.00
1-7	1.87	3.00
1-8	1.87	3.00
1-9	1.87	3.00
1-10	2.50	4.00

1-11	2.50	4.00
1-12	2.50	4.00

After the first 12 calendar months of operation, or the first 12 calendar months following the issuance of this permit, compliance with the annual individual and combined HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever these emissions units are 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for eachemissions unit:

a. the name and identification number of each coating and cleanup material employed;

b. the VOC content (excluding water and exempt solvents) of each coating and cleanup material, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating and cleanup material, as applied;

d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(1)b. times d)(1)c. for each coating employed];

e. the daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$;

f. the daily VOC emissions from all the cleanup material employed, in pounds, [i.e., the sum of d)(1)b. times d)(1)c. for each cleanup material employed]; and

g. the total daily VOC emissions from all the coatings and cleanup materials employed, in pounds, [i.e., the sum of d)(1)d and d)(1)f].

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(2) For each month, the permittee shall collect and record the following information for the purpose of calculating the rolling, 12-month summation of HAP emissions for each coating and cleanup material employed in emission units K001 and K002, combined:

a. the name and identification number of each coating and cleanup material, as applied;

b. the individual HAP content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating and cleanup material, in pounds of combined HAP per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. the number of gallons of each coating and cleanup material employed;

e. the total individual HAP emissions from all coatings and cleanup materials employed, in tons per month [for each HAP, the sum of (b) time (d) for all of the coatings and cleanup materials divided by 2000];

f. the total combined HAP emissions from all coatings and cleanup materials employed, in tons per month [the sum of (c) times (d) for all of the coatings and cleanup materials divided by 2000];

g. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in tons [the sum of (e) for the previous 12 calendar months]; and

h. the rolling, 12-month summation of the total combined HAPs emissions from all coatings and cleanup materials employed, in tons [the sum of (f) for the previous calendar months].

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative individual and combined HAPemissions for each calendar month.

(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 units are 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 units 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 federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted from the emissions units, (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. Short Term Exposure Limit (STEL) 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 adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "X" hours per day and "Y" 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 MAGLC:

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant:

Toxic Contaminant: Xylene.
TLV (mg/m3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 2.91
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 16.59
MAGLC (ug/m3): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units K001 and K002, is 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).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 changes 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 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 units or 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 changes 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 changes meet 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.

(10) 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 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 units or the materials applied.

(11) 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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall notify the Director (appropriate District Office or Local Air Agency) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or Local Air Agency) within 30 days after the exceedance occurs.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

i. 2.5 tons of any individual HAP for the entire facility per rolling, 12-month period; and

ii. 4.0 tons of combined HAPs for the entire facility per rolling, 12-month period.

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); and

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

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, 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 Director (the appropriate District Office or Local Air Agency).

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.

(5) 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:

85.4 lbs VOC/day and 15.6 tons VOC/yr for emissions unit K001

100.1 lbs VOC/day and 18.3 tons VOC/yr for emissions unit K002

Applicable Compliance Methods:

Compliance with the daily VOC limitations shall be demonstrated based upon the record keeping requirements specified in section d)(1).

The annual emission limitation was developed by multiplying the daily mass emission limitation by 365 days per year, and then dividing by 2000 pounds per ton. Therefore compliance with the annual limitation shall be demonstrated if compliance with the daily limitation is maintained.

b. Emission Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the coating VOC content shall be based upon the record keeping specified in d)(1).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitations:

Combined annual emissions from K001 & K002 shall not exceed 2.5 tons of any individual HAP and 4.0 tons of combined HAPs as rolling, 12-month summations.

Applicable Compliance Method:

Compliance with the rolling 12-month summation limitations shall be demonstrated based on the record keeping requirements in d)(2).

g) Miscellaneous Requirements

(1) None.