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

10/29/2013

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Todd Harbour
Metal Coaters
10943 N. Sam Houston Pkwy W.
Houston, TX 77064

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1409000037
Permit Number: P0115260
Permit Type: Administrative Modification
County: Butler

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Metal Coaters

Facility ID:	1409000037
Permit Number:	P0115260
Permit Type:	Administrative Modification
Issued:	10/29/2013
Effective:	10/29/2013

Division of Air Pollution Control
Permit-to-Install
for
Metal Coaters

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 8
9. Reporting Requirements 8
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 10
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K001, Coating Line 14

Authorization

Facility ID:	1409000037
Facility Description:	Steel coil coating operation and associated processes
Application Number(s):	M0002163
Permit Number:	P0115260
Permit Description:	Company-requested administrative modification to PTIO P0110354 to allow use of two thermal oxidizers as an alternative to use of two thermal oxidizers and a rotor VOC accumulator with catalytic oxidizer for control of emissions from coating line K001.
Permit Type:	Administrative Modification
Permit Fee:	$375.00
Issue Date:	10/29/2013
Effective Date:	10/29/2013

This document constitutes issuance to:

Metal Coaters
2400 Yankee Road
Middletown, OH 45044

of a Permit-to-Install 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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115260
Permit Description: Company-requested administrative modification to PTIO P0110354 to allow use of two thermal oxidizers as an alternative to use of two thermal oxidizers and a rotor VOC accumulator with catalytic oxidizer for control of emissions from coating line K001.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Coating Line
Superseded Permit Number:	P0110354
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Southwest Ohio Air Quality Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theSouthwest Ohio Air Quality Agencyin accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of

installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Metal Coil: K001. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart SSSS. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart SSSS. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart SSSS and Subpart A.

C. Emissions Unit Terms and Conditions

1. K001, Coating Line

Operations, Property and/or Equipment Description:

Coil Coating Line, consisting of four coating stations and two natural gas-fired high-bake ovens, two thermal oxidizers, and a rotor VOC concentrator equipped with a catalytic oxidizer.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) *Best Available Technology*	For the emissions from coatings and solvents employed in the surface coating operations, the requirements of this rule shall be demonstrated by compliance with the requirements of 40 CFR Part 63, Subpart SSSS, for coil coating lines. From the combustion of natural gas (high-bake ovens, thermal oxidizers, and concentrator catalytic oxidizer): Nitrogen oxides (NOx) emissions shall not exceed 0.098 pound per MMBtu*; Carbon monoxide (CO) emissions shall not exceed 0.082 pound per MMBtu*; and Volatile organic compound (VOC) emissions shall not exceed 0.0054 pound per MMBtu*. *The emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no record keeping is required to demonstrate compliance with these limitations. See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) *Federally-Enforceable Limitations to Avoid Major Stationary Source Status under New Source Review*	VOC emissions shall not exceed 96.0 tons per year (TPY), as a rolling 12-month summation, from all coatings and solvents employed. See b)(2)b., c)(1), c)(2), and c)(3).
c.	OAC rule 3745-21-09(E) OAC rule 3745-21-09(B)(6) *Reasonably Available Control Technology (RACT) for Coil Coating Lines*	The requirements of these rules are less stringent than the requirements established pursuant to 40 CFR Part 63, Subpart SSSS, ORC 3704.03(T), and OAC rule 3745-31-05(D).
d.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5209) [In accordance with 63.5100 and 63.5110, the emissions unit is an existing coil coating line subject to the emission limitations/control measures specified in this rule.]	e b)(2)d. for the applicable emissions standards. Table 1 to 40 CFR Part 63, Subpart SSSS – Operating Limits if Using Add-on Control Devices and Capture System [40 CFR 63.5121]
e.	40 CFR Part 63, Subpart A (40 CFR 63.5140)	Table 2 to 40 CFR Part 63, Subpart SSSS – Applicability of General Provisions (Subpart A) to Subpart SSSS shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. The BAT determination pursuant to ORC 3704.03(T) for this emissions unit includes:

i. compliance with the requirements of the NESHAP 40 CFR Part 63, Subpart SSSS, for Surface Coating of Metal Coil;

ii. use of natural gas in the ovens and oxidizers associated with this emissions unit;

iii. employ good combustion practices to reduce NOx emissions to 0.098 pound per MMBtu;

iv. employ good combustion practices to reduce CO emissions to 0.082 pound per MMBtu; and

v. employ good combustion practices to reduce VOC emissions to 0.0054 pound per MMBtu.

b. The annual VOC emissions from natural gas combustion in this emissions unit, based upon the potential to emit of 0.0054 pound of VOC per MMBtu and the maximum heat input capacity of 80.7 MMBtu per hour for all combustion sources on the emissions unit, is 1.91 TPY of VOC assuming 8,760 hours of operation per year. Compliance with the federally-enforceable VOC limitation in b)(1)b. combined with the potential to emit of 1.91 TPY VOC from natural gas combustion will ensure that the source avoids major status under nonattainment new source review.

c. "Solvent" as used in the terms and conditions of this permit for emissions unit K001 shall be defined as both reducing solvent added to any coatings and solvent used for cleanup and line purging.

d. Each coil coating affected source must limit organic HAP emissions to the level specified in i., ii.,<u>or</u> iii. below [40 CFR 63.5120]:

i. No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

ii. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

iii. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Compliance with one of these standards must be demonstrated by following the applicable procedures in 40 CFR 63.5170.

c) Operational Restrictions

(1) The federally-enforceable limitations established pursuant to OAC rule 3745-31-05(D) for this emissions unit include the following:

a. Rotor VOC concentrator in operation:

i. all VOC emissions from this emissions unit shall be captured within the coating stations and vented to the thermal oxidizers and the rotor VOC concentrator. The thermal oxidizers and rotor VOC concentrator shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation;

ii. each thermal oxidizer shall provide an efficiency (percent destruction) of not less than 98 percent, by weight, for the VOC emissions vented to it; and

iii. the rotor VOC concentrator with catalytic oxidizer shall provide an efficiency (percent destruction) of not less than 95 percent, by weight, for the VOC emissions vented to it.

b. Rotor concentrator not in operation:

i. all VOC emissions from this emissions unit shall be captured within the coating stations and vented to the thermal oxidizers. The thermal oxidizers shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation; and

ii. each thermal oxidizer shall provide an efficiency (percent destruction) of not less than 98 percent, by weight, for the VOC emissions vented to it.

(2) The maximum coating and solvent usage for this emissions unit shall be limited by the following formula, calculated as a rolling 12-month period:

$$\frac{\{\Sigma(VOCa)(Ua_{WC}) - RCa\}}{2000\ lbs/tons} \times (1-DREt_{WC})(CAEc)(0.95^*) +$$

$$\frac{\{\Sigma(VOCa)(Ua_{WC}) - RCa\}}{2000\ lbs/tons} \times (1-DREv)(CAEc)(0.05^*) +$$

$$\frac{\{\Sigma(VOCa)(Ua_{WOC}) - RCa\}}{2000\ lbs/tons} \times (1-DREt_{WOC})(CAEc) \leq 96\ TPY\ of\ VOC.$$

where,

VOCa = volatile organic compound content (lb/gal) of coating a and solvent a, applied at the coating stations;

Ua_{WC} = usage (gallons) of coating a and solvent a, applied at the coating stations, when the concentrator is in operation;

Ua_{WOC} = usage (gallons) of coating a and solvent a, applied at the coating stations, when the concentrator is not in operation;

RCa = Recovery credit for pounds of VOC recovered from waste solvent at the coating stations;

$DREt_{WC}$ = destruction removal efficiency of the thermal oxidizers** when the concentrator is in operation;

$DREt_{WOC}$ = destruction removal efficiency of the thermal oxidizers** when the concentrator is not in operation;

CAEc = capture efficiency of the coating stations (100%); and

DREv = destruction removal efficiency of the VOC concentrator.

*Fractional percentages of the captured emissions within the coating stations attributed to exhaust through the oven/thermal oxidizer system andthe VOC concentrator system. The permittee shall confirm these exhaust stream emission factors provided in the application for PTI P0110354 during performance testing as specified in f)(3).

**The permittee shall utilize the lowest average destruction efficiency value of either thermal oxidizer based upon the most recent performance test, which demonstrated compliance with the terms and conditions of this permit, pursuant to the formula above. Alternatively, if the permittee elects to demonstrate compliance by calculating separate prime and finish coating usage and emissions, the permittee may request approval from the Ohio EPA District Office or local air agency for an alternative formula limiting VOC emissions to 96 TPY or less. Approved revisions to the formula specified above will not constitute a relaxation of the operational or monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The VOC concentrator's catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals when the emissions unit controlled by the VOC concentrator is in operation. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(4) See 40 CFR Part 63, Subpart SSSS, (40 CFR 63.5080-5209) and Table 1 to 40 CFR Part 63, Subpart SSSS, for applicable operational restrictions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification for each coating and solvent employed;

b. the VOC content of each coating and solvent employed, in pounds of VOC per gallon;

c. the amount of each coating and solvent employed, in gallons per month;

d. the uncontrolled total VOC emissions from all coatings and solvent employed, in pounds or tons per month, prior to any credit for recovered materials;

e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings and solvent employed, in pounds or tons (see d)(2) below);

f. the uncontrolled total VOC emissions from all coatings and solvent employed, in pounds or tons per month, adjusted for any recovery credit;

g. the controlled net VOC emissions from all coatings and solvents, employed, in pounds or tons per month (based on the most recent emissions testing);

h. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of VOC emissions for the current month recorded in line g. plus the total amount of VOC emissions for the previous 11 calendar months); and

i. each period of time (start time and date, and end time and date) when the damper to the VOC concentrator is closed.

(2) If waste solvent is collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:

a. the amount of waste solvent recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered solvent is maintained by weight and VOC content in percent by weight);

b. the VOC content of the recovered waste solvent, which shall be based upon an independent laboratory analyses performed for waste stream characterization within the previous 12 months or a laboratory analysis by the facility to which the waste solvent is shipped; and

c. the date the recovered waste solvent was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility.

***** The monthly total volume or weight of the collected waste solvent may be calculated using a prorated method by averaging the volume or weight of the waste solvent recovered and shipped off-site over the number of operating days since the previous shipment.

(3) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable average combustion temperature within the thermal oxidizers, for any three-hour block of time when the emissions unit controlled by the thermal oxidizers is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance. Until compliance testing has been conducted, the thermal oxidizers shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(4) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable average inlet temperature within the desorption/reactivation zone of the VOC concentrator, for any three-hour block of time when the emissions unit controlled by the VOC concentrator is in operation, shall not be more than 50 degrees Fahrenheit below the average inlet temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance. Until compliance testing has been conducted, the VOC concentrator shall be operated and maintained in accordance with the manufacturer’s recommendations, instructions, and the operating manual.

(5) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any three-hour block of time when the emissions unit controlled by the VOC concentrator is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance. Until compliance testing has been conducted, the VOC concentrator’s catalytic oxidizer shall be operated and maintained

in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(6) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorders that measure and record the combustion temperature within each thermal oxidizer, the inlet temperature to the VOC concentrator desorption/reactivation zone when the emissions unit controlled by the VOC concentrator is in operation, and the temperature of the exhaust gases immediately before the catalyst bed when the emissions unit controlled by the VOC concentrator is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature settings shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit is in operation:

a. all three-hour blocks of time, when the emissions unit controlled by the thermal oxidizers was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

b. all three-hour blocks of time, when the emissions unit controlled by the VOC concentrator was in operation, during which the average inlet temperature within the desorption/reactivation zone of the VOC concentrator was more than 50 degrees Fahrenheit below the average inlet temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance;

c. all three-hour blocks of time, when the emissions unit controlled by the VOC concentrator was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and

d. a log (date and total time) of the downtime or bypass of the capture (collection) system and control devices (thermal oxidizers), and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

(7) The permittee shall perform a preventative maintenance inspection of the VOC concentrator's catalytic oxidizer in accordance with the manufacturer's suggested frequency to evaluate the performance of the catalyst bed when the emissions unit

controlled by the VOC concentrator is in operation. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. A sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test annually, unless more frequent testing is recommended by the manufacturer. The permittee shall maintain a record of the results of each inspection and the results of each annual catalyst activity test.

(8) See 40 CFR Part 63, Subpart SSSS, (40 CFR 63.5080-5209) for applicable monitoring and record keeping requirements.

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 submit quarterly deviation (excursion) reports that identify the following:

a. an identification of any deviation from the VOC capture and control efficiency requirements for this emissions unit specified in term and condition c)(1);

b. an identification of all exceedances of the rolling, 12-month VOC emission limitation of 96.0 TPY for this emissions unit;

c. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizers was outside of the range specified by the manufacturer and/or outside of the acceptable range specified in term and condition d)(3) following any required compliance demonstration;

d. each period of time (start time and date, and end time and date) when the average inlet temperature within the desorption/reactivation zone of the VOC concentrator was outside of the range specified by the manufacturer and/or outside of the acceptable range specified in term and condition d)(4) following any required compliance demonstration when the emissions unit controlled by the VOC concentrator is in operation;

e. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed was outside of the range specified by the manufacturer and/or outside of the acceptable range specified in term and condition d)(5) when the emissions unit controlled by the VOC concentrator is in operation following any required compliance demonstration;

f. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizers.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) See 40 CFR Part 63, Subpart SSSS, (40 CFR 63.5080-5209) for applicable reporting requirements.

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:

From the combustion of natural gas:

NOx emissions shall not exceed 0.098 pound per MMBtu.

CO emissions shall not exceed 0.082 pound per MMBtu.

Applicable Compliance Method:

The NOx and CO emission limitations above are based upon the emissions unit's potential to emit from the combustion of natural gas and the US EPA's AP-42 emission factors for uncontrolled combustor types less than 100 MMBtu per hour found in Section 1.4, Table 1.4-1, dated 7/1998.

b. Emission Limitation:

From the combustion of natural gas:

VOC emissions shall not exceed 0.0054 pound per MMBtu.

Applicable Compliance Method:

The VOC emission limitation above is based upon the emissions unit's potential to emit from the combustion of natural gas and the US EPA's AP-42 emission factors found in Section 1.4, Table 1.4-2, dated 7/1998.

c. Emission Limitation:

VOC emissions shall not exceed 96.0 TPY, as a rolling 12-month summation, from all coatings and solvents employed.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping required in d)(1) and the performance testing required in f)(3) below. U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of the coatings and solvents.

d. Emission Limitations:

No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Methods:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart SSSS, shall be based upon the compliance demonstration utilized by the permittee pursuant to Table 1 of 40 CFR 63.5170 and the record keeping and performance testing requirements specified in 40 CFR 63.5080-5209.

(2) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected annually (or more frequently if prescribed by the manufacturer) as described in d)(7) of this permit when the emissions unit controlled by the VOC concentrator is in operation. An “Intent to Test” notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer’s recommendations and as required by the appropriate test method.

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

a. The emission testing shall be conducted within 120 days after the startup of the emissions unit following this permitting action.

b. The emission testing shall be conducted to demonstrate compliance with the requirements specified in term and condition c)(1) for the VOC capture efficiency of the coating stations and a destruction efficiency of 98 percent for VOC emissions entering each thermal oxidizer and a destruction efficiency of 95 percent for VOC emissions entering the VOC concentrator. The emission testing shall also confirm the emission factors utilized in c)(2) for the exhaust streams entering the oven/thermal oxidizer system and as well as the VOC concentrator from the coating stations when the emissions unit controlled by the VOC concentrator is in operation.

c. The following test method(s) shall be employed to demonstrate compliance:

i. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

ii. The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

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

g) Miscellaneous Requirements

(1) None.