



1/14/2014

Mike Kovacs
 Norplas Industries Inc.
 7825 Caple Blvd
 Northwood, OH 43619

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0387000362
 Permit Number: P0114197
 Permit Type: Initial Installation
 County: Wood

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (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 Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Norplas Industries Inc.**

Facility ID:	0387000362
Permit Number:	P0114197
Permit Type:	Initial Installation
Issued:	1/14/2014
Effective:	1/14/2014



Division of Air Pollution Control
Permit-to-Install
for
Norplas Industries Inc.

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Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

Authorization

Facility ID: 0387000362
Facility Description: Injection molding and painting of automotive plastic components
Application Number(s): A0046763, A0048303
Permit Number: P0114197
Permit Description: The mold presses are being permitted for the first time, due to an evaluation which showed that the mold presses, individually or as a group, do not meet the requirements for an exemption from PTI requirements. These are being grouped into one emissions unit (P117) because the recordkeeping for spray mold release and environmental cleaner/degreaser is tracked for the group, not individual mold presses. One new mold press is being installed, and 11 are existing emissions units. Norplas has requested administrative PTI modifications for the following emissions units: P001 Misc. Cleanup Operations administrative modification to lower the organic compound (OC) emissions limit, based on historical solvent usage; P002 Paint Kitchen (paint kettles, mini pigable systems, and mini catalyst systems) administrative modification to lower the OC emissions limit, based on historical solvent usage, and combine all paint kettles, pigable systems, and mini catalyst systems into one emissions unit (two new paint kettles are being installed); R001 Paint Line administrative modification to correct the emissions limitations for the products of combustion, and to separate the emissions limitations for the RTO stack from the stacks serving two of the ovens which emit only products of combustion; T001 Solvent Storage Tank #1 (virgin) administrative modification to correct the throughput limitation; and T002 Solvent Storage Tank #2 (waste) administrative modification to correct the throughput limitation.

Permit Type: Initial Installation
Permit Fee: \$700.00
Issue Date: 1/14/2014
Effective Date: 1/14/2014

This document constitutes issuance to:

Norplas Industries Inc.
7825 Caple Blvd.
Northwood, OH 43619

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

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


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0114197
Permit Description: The mold presses are being permitted for the first time, due to an evaluation which showed that the mold presses, individually or as a group, do not meet the requirements for an exemption from PTI requirements. These are being grouped into one emissions unit (P117) because the recordkeeping for spray mold release and environmental cleaner/degreaser is tracked for the group, not individual mold presses. One new mold press is being installed, and 11 are existing emissions units. Norplas has requested administrative PTI modifications for the following emissions units: P001 Misc. Cleanup Operations administrative modification to lower the organic compound (OC) emissions limit, based on historical solvent usage; P002 Paint Kitchen (paint kettles, mini pigable systems, and mini catalyst systems) administrative modification to lower the OC emissions limit, based on historical solvent usage, and combine all paint kettles, pigable systems, and mini catalyst systems into one emissions unit (two new paint kettles are being installed); R001 Paint Line administrative modification to correct the emissions limitations for the products of combustion, and to separate the emissions limitations for the RTO stack from the stacks serving two of the ovens which emit only products of combustion; T001 Solvent Storage Tank #1 (virgin) administrative modification to correct the throughput limitation; and T002 Solvent Storage Tank #2 (waste) administrative modification to correct the throughput limitation.

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

- | | |
|-----------------------------------|---|
| Emissions Unit ID: | P001 |
| Company Equipment ID: | Misc. Cleanup Operations |
| Superseded Permit Number: | 03-0137 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | PaintKitchen (paint kettles, mini pigable systems, and mini |
| Superseded Permit Number: | 03-0137 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P117 |
| Company Equipment ID: | Mold Presses (12) |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R001 |
| Company Equipment ID: | Paint Line |
| Superseded Permit Number: | P0108439 |
| General Permit Category and Type: | Not Applicable |

Group Name: Storage Tanks 1 & 2

Emissions Unit ID:	T001
Company Equipment ID:	Storage Tank # 1
Superseded Permit Number:	P0105840
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Storage Tank # 2



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

Superseded Permit Number:	P0105840
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

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 Ohio EPA DAPC, Northwest District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions,



and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. 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, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office 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 the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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 obtained before 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 entered upon 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.



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

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 units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products): P001, P002, R001, T001, and T002. The complete MACT requirements, including the MACT 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.



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

C. Emissions Unit Terms and Conditions



1. P001, Misc. Cleanup Operations

Operations, Property and/or Equipment Description:

Misc. Cleanup Operations

- 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) d)(2).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [Administrative modification to PTI #03-0137, issued January 3, 1997, to reduce the organic compound (OC)* emission limitation] *For purposes of this determination, all OC's are considered VOC's.	32.63 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation of the monthly VOC emissions. See b)(2)a.
b.	40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880-3981) [In accordance with 40 CFR 63.3981, "cleaning material" used to clean the coating operation equipment is included in the definition of a "coating operation". These controlled and/or uncontrolled emissions are subject to the applicable requirements specified in Subpart Mmmm.]	See b)(2)b.
c.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart Mmmm of 40 CFR, Part 63 – Applicability of General Provisions to Subpart Mmmm of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	40 CFR Part 63, Subpart Pppp (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4581, "cleaning material" used to	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	clean the coating operation equipment is included in the definition of a “ <i>coating operation</i> ”. These controlled and/or uncontrolled emissions are subject to the applicable requirements specified in Subpart PPPP.]	
e.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with 40 CFR, Part 63, Subparts MMMM and PPPP.
- b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the “affected source” under the MACT MMMM regulations.



The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

- c. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" under the MACT PPPP regulations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.4483.

- d. The emission standards set forth in 40 CFR Part 63, Subparts MMMM and PPPP shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

- (1) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].
- (2) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

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 of each cleanup material employed;
 - b. The number of gallons of each cleanup material employed;
 - c. The VOC content of each cleanup material employed, in pounds per gallon;
 - d. The total VOC emission rate for each cleanup material employed [d)(1)b. x d)(1)c., divided by 2000], in tons;
 - e. The total VOC emission rate for all the cleanup materials employed [summation of d(1)d.], in tons; and
 - f. The rolling, 12-month summation of the monthly VOC emission rates, in tons.
- (2) This permit allows for the use of the coatings and cleanup materials specified by the permittee. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the n-butyl acetate, ethyl acetate, n-butyl alcohol, ethyl alcohol, ethylene glycol monobutyl ether acetate, heptane, isobutyl acetate, isobutyl alcohol, isopropyl alcohol, methyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, n-propyl alcohol, toluene, and xylenes emission limitations specified in PTI 03-0137 were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Trinityh Consultants ISCST3, Version 1.12 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. All toxic constituents were assumed to be emitted at the highest rate of any of the constituents (xylenes, 32.63 g/s). This resulted in a peak one-hour predicted concentration of 2,075.96 ug/M³, which was less than the MAGLC for each of the toxic constituents with the exception of ethylene glycol monobutyl ether acetate. This constituent was specifically ran at its calculated emission rate to determine a peak impact. The peak predicted concentration of this toxic was 58.66 ug/M³ (MAGLC = 571 ug/M³). The following table summarizes the results of the modeling for each pollutant:

Pollutant	TLV (ug/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1-hour Maximum Ground-level Concentration at The Fenceline (ug/m ³)	Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m ³)
n-butyl acetate	710000	5.13	2075.96	16905
Ethyl acetate	1440000	184	2075.96	34286
n-butyl alcohol	152000	3.24	2075.96	3619
Ethyl alcohol	1880000	11.94	2075.96	44762
Ethylene glycol monobutylether	24000	0.76	58.66	571



Pollutant	TLV (ug/m ³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1-hour Maximum Ground-level Concentration at The Fenceline (ug/m ³)	Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m ³)
acetate				
Heptane	1600000	0.60	2075.96	38095
Isobutyl acetate	700000	0.60	2075.96	16667
Isobutyl alcohol	150000	1.10	2075.96	3571
Isopropyl alcohol	980000	14.6	2075.96	23333
Methyl alcohol	260000	10.80	2075.96	6190
Methyl ethyl ketone	590000	14.85	2075.96	14048
Methyl isobutyl ketone	205000	1.60	2075.96	4881
n-propyl alcohol	500000	12.40	2075.96	11905
Toluene	375000	9.20	2075.96	8929
xylene	435000	32.63	2075.96	10357

Any of the following changes may be deemed a “modification” to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office are required:

- a. Any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value specified in the above table;
- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, or decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC; and



d. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01.

(3) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].

(4) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month VOC emission limitation of 32.63 tons. All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(2) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].

(3) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

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:

32.63 tons VOC/year, based upon a rolling 12-month summation of the monthly VOC emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation through the recordkeeping requirements in section d)(1) of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all of the cleanup materials.

g) Miscellaneous Requirements

(1) None.



2. P002, Paint Kitchen (paint kettles, mini pigable systems, and mini catalyst systems)

Operations, Property and/or Equipment Description:

Paint Kitchen (paint kettles, mini pigable systems, and mini catalyst systems).

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.	OAC rule 3745-31-05(A)(3) (Administrative modification to PTI #03-0137, issued January 3, 1997, to reduce the organic compound (OC)* emission limitation and combine all paint kettles into one emissions unit) *For purposes of this determination, all OC's are considered VOC's.	13.94 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation of the monthly VOC emissions. See b)(2)a.
b.	40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880-3981)	See b)(2)b.
c.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart Mmmm of 40 CFR, Part 63 – Applicability of General Provisions to Subpart Mmmm of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	40 CFR Part 63, Subpart Pppp (40 CFR 63.4480-4581)89	See b)(2)c.
e.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart Pppp of 40 CFR, Part 63 – Applicability of General Provisions to Subpart Pppp of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with 40 CFR, Part 63, Subparts Mmmm and Pppp.



- b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" under the MMMM MACT regulations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

- c. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and



- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" under the MACT PPPP regulations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.4483.

- d. The emission standards set forth in 40 CFR Part 63, Subparts Mmmm and Pppp shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.
- c) Operational Restrictions
 - (1) See 40 CFR, Part 63, Subpart Mmmm [40 CFR 63.3880 – 63.3981].
 - (2) See 40 CFR, Part 63, Subpart Pppp [40 CFR 63.4480 – 63.4581].
 - 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 of each coating and cleanup material processed;
 - b. The number of gallons of each coating material processed;
 - c. The VOC content of each coating and cleanup material processed, in pounds per gallon;
 - d. The total VOC emission rate for each cleanup material employed [d)(1)b. x d)(1)c., divided by 2000], in tons;
 - e. The total VOC emission rate for all the cleanup materials employed [summation of d(1)d.], in tons; and
 - f. The rolling, 12-month summation of the monthly VOC emission rates, in tons.
 - (2) This permit addresses the current and proposed modified paint kitchen operations which are based on designs to optimize operational flexibility and production capability. Prior to making any physical change or change in the method of operation (i.e., changing coating material/ingredients, paint kettle size, etc.) at the facility which were not incorporated into the initial design and could reasonably be expected to increase the production capability of this emissions unit, the permittee shall conduct an evaluation to



determine if the change would constitute a “modification” as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final PTI modification prior to performing such change as required by OAC rule 3745-31. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

- (3) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].
- (4) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month VOC emission limitation of 13.94 tons. All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.
- (2) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].
- (3) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

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:

13.94 tons VOC/year, based upon a rolling, 12-month summation of the monthly VOC emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation through the recordkeeping requirements in section d)(1) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all of the coating materials.

g) Miscellaneous Requirements

- (1) None.



3. P117, Mold Presses

Operations, Property and/or Equipment Description:

Mold Presses (formerly TMP177452)

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) b)(1)b, d)(3), d)(4), d)(5), d)(6), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	1.95 tons volatile organic compounds (VOC)/month averaged over a rolling 12-month period. See b)(2)a.
b.	OAC rule 3745-114 and ORC 3704.03 (F)	See d)(3), d)(4), d)(5), d)(6), and e)(2)

(2) Additional Terms and Conditions

a. The BAT requirements under ORC 3704.03(T) have been determined to the following:

i. 1.95 tons VOC/month averaged over a rolling 12-month period from the mold press operations.

c) Operational Restrictions

(1) None.

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 VOC-containing material (ThermoPlastic Olefin, sprayon environmental cleaner/degreaser, and slide mold release);



- b. The number of pounds (lbs.) of each ThermoPlastic Olefin used;
 - c. The VOC content of each ThermoPlastic Olefin used (%);
 - d. The total VOC emissions from each ThermoPlastic Olefin used [d)(1)b. x d)(1)c. x an emissions factor of 1%], in lbs.;
 - e. The VOC content of each spray on environmental cleaner/degreaser and slide mold release used (in lb/gal.);
 - f. The number of gallons (gal.) of each spray on environmental cleaner/degreaser and slide mold release;
 - g. The total VOC emissions from each spray on environmental cleaner/degreaser and slide mold release used [d)(1)e. x d)(1)f.], in lbs.;
 - h. The total VOC emissions from all VOC-containing material (ThermoPlastic Olefin, spray on environmental cleaner/degreaser, and slide mold release) [sum of d)(1)d. + d)(1)g.]; and
 - i. Following the first 12 calendar months of operation, the rolling 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.
- (2) This permit addresses the current and proposed modified molding press operations which are based on designs to optimize operational flexibility and production capability. Prior to making any physical change or change in the method of operation (i.e., changing molding material, press size, etc.) at the facility which were not incorporated into the initial design and could reasonably be expected to increase the production capability of this emissions unit, the permittee shall conduct an evaluation to determine if the change would constitute a “modification” as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final PTI modification prior to performing such change as required by OAC rule 3745-31. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.
- (3) The permit-to-install (PTI) application for this emissions unit, P117, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 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 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 unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: hexane

TLV (mg/m³): 176.24

Maximum Hourly Emission Rate (lbs/hr): 0.235

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11.30

MAGLC (ug/m³): 4196.2

The permittee, has demonstrated that emissions of hexane, from emissions unit P117, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the



predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit-to-install (PTI) 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.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination



that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify:
 - a. All exceedances of the monthly VOC emission limitation of 1.95 tons averaged over a 12-month rolling period.

If no deviations (excursions) occurred during a calendar quarter, the permittee 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).

- (2) The permittee shall submit annual reports that include any changes to any 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 concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that 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 Limitation:

1.95 tons VOC/month averaged over a rolling 12-month period

Applicable Compliance Method:

The record keeping requirements specified in Section d)(1) of this permit shall be used to determine compliance with the allowable monthly emission limitation averaged over a rolling 12-month period.

g) Miscellaneous Requirements

(1) None.



4. R001, Paint Line

Operations, Property and/or Equipment Description:

Paint Line #1

- 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.	OAC rule 3745-31-05(A)(3) (Administrative modification to PTI #P0108439, issued 10-09-2012, to correct the emissions limitations associated with the products of combustion, and to separate the emissions limitations for the RTO stack from the stacks serving only ovens)	<p><u>From the thermal oxidizer exhaust stack:</u> 28.2 lbs volatile organic compounds (VOC)/hr; 2.0 lbs nitrogen oxides (NOx)/hr and 8.76 tons NOx/yr; 1.0 lbs particulate matter less than 10 microns (PM10)/hr and 4.38 tons PM10/yr; and 3.0 lbs carbon monoxide (CO)/hr and 13.14 tons CO/yr.</p> <p><u>From all natural gas combustion units not associated with the RTO stack:</u> 0.098 lbsNOx/mmBtu and 3.77 tons NOx/year; 0.0019 lb PM10/mmBtu and 0.09 ton PM10/year; and 0.082 lb CO/mmBtu and 3.15 tons CO/year.</p> <p>See b)(2)a. through b)(2)e. and b)(2)g.</p>
b.	OAC rule 3745-31-05(D)	<p>143.77 tons VOC/year, based upon a rolling, 12-month summation of the monthly VOC emission rates [from the thermal oxidizer exhaust stack and total fugitive emissions*, combined];</p> <p>*This includes VOCs emitted from paint sludge at the facility, where the sludge is</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		generated, and at the processing/disposal facility (off site), combined.
	OAC rule 3745-17-11(C)	See b)(2)f., c)(3), and c)(4)
	OAC rule 3745-21-07(M)	See b)(2)h.
	OAC rule 3745-21-09(B)(6)	See b)(2)h.
	<p>40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-3981)</p> <p>[In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a miscellaneous metal parts coating line with add-on controls (a regenerative thermal oxidizer) subject to the emissions limitations/control measures specified in Subpart MMMM.]</p>	<p>The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c).</p> <p>[In accordance with 40 CFR 63.3890(b)(1), this emissions unit meets the applicability criteria of the general use category. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.]</p> <p>Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule.</p> <p>See b)(2)i. through b)(2)m., and b)(2)q. through b)(2)s.</p>
	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
	<p>40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)</p> <p>[In accordance with 40 CFR 63.4481 (a) & (b) and 40 CFR 63.4482(a), (b), and (e), this emissions unit is an existing plastic parts coating line with add-on controls (a regenerative thermal oxidizer) subject to the emissions limitations/control measures specified in Subpart PPPP.]</p>	<p>The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c).</p> <p>[In accordance with 40 CFR 63.3890(b)(1), this emissions unit currently meets the applicability criteria of the thermoplastic olefin (TPO) coating use category. For each existing TPO coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.26 kg (0.26 lb) organic</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>HAP emitted per kg (lb) coating solids used during each 12-month compliance period.]</p> <p>Compliance with this standard shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule.</p> <p>See b)(2)l. through b)(2)s.</p>
	<p>40 CFR 63.1-15 [40 CFR 63.4501]</p>	<p>Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.</p>

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a permanent total enclosure capturing exhaust gases from all paint booths, flash-off areas and bake ovens and exhausting to a regenerative thermal oxidizer in conjunction with an exhaust recirculation system. The bake ovens shall be fitted with low NOx burners. The regenerative thermal oxidizer shall ensure that 95% of the carbon in the organic material being incinerated is oxidized to carbon dioxide. Best available technology for paint application has been determined to be an automatic or robotic paint spray system using electrostatic applicators or equivalent technology and use of a water wash system for control of particulate emissions. The paint spray system shall achieve transfer efficiencies of 35 – 50%.
- b. The permanent total enclosure shall be constructed to totally enclose the emissions unit such that all volatile organic compound emissions are captured, contained, and directed to the control device.
- c. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr).
- d. All of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- e. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.



- f. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(C), 3745-21-07(M), and 3745-21-09(B)(6); and 40 CFR, Part 63, Subpart M, and 40 CFR, Part 63, Subpart P.
- g. The control requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). For the purpose of this determination, all OC's are considered to be VOC's.
- h. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart M.

The final rules found in 40 CFR Part 63, Subpart M establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883. [See 40 CFR 63.3880-3981.]

- i. The options for compliance when using more than one type of coating are described in 40 CFR 63.3890(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.3930(c), and submit reports demonstrating compliance, as required in 63.3920. [See 40 CFR 63.3880-3981.]
- j. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of



the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891, however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-3981.]

- k. The permittee may comply with 40 CFR Part 63, Subpart Mmmm and Subpart Pppp separately, or may select a predominant activity, or may calculate a facility-specific emission limit from the relative amount of coating activity that is subject to each emission limit. These options are described in 40 CFR 63.3881(e) and 63.4481(e). [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]
- l. The coating operation shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and/or 40 CFR 63.4490 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581, at all times except during periods of startup, shutdown, and malfunction. The coating operation shall be operated in compliance with the work practice standards in 40 CFR 63.3893 and/or 40 CFR 63.4493 at all times. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]
- m. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Pppp.

The final rules found in 40 CFR Part 63, Subpart Pppp establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.4483. [See 40 CFR 63.4480-4581.]

- n. The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain



documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520. [See 40 CFR 63.4480-4581.]

- o. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491, however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]
- p. The permittee shall conduct or have conducted a performance test according to 40 CFR Part 63 Subpart Mmmm sections 63.3964, 63.3965, and 63.3966 and/or 40 CFR Part 63 Subpart Pppp sections 63.4564, 63.4565, and 63.4566 for each capture system and the thermal oxidizer. The permittee shall establish the operating limits required by 40 CFR 63.3892 and 40 CFR 63.4492, and in accordance with 40 CFR 63.3967 and 40 CFR 63.4567, no later than 180 days after the compliance date specified in b)(2)i. and/or b)(2)n. above. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]
- q. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:
 - i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.
 - ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.
 - iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.
 - iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.
 - v. The SSMP shall be written for the following purpose:
 - (a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;



- (b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;
 - (c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and
 - (d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.
- vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.
- vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.
- viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.
- ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:
 - (a) does not address a startup, shutdown, or malfunction event that has occurred;



- (b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;
- (c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or
- (d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

- x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).
- xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.
- xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.



- xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.
 - xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.
 - r. The emission standards set forth in 40 CFR Part 63, Subparts Mmmm and Pppp shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]
 - s. See 40 CFR, Part 63, Subpart Mmmm [40 CFR 63.3880 – 63.3981].
 - t. See 40 CFR, Part 63, Subpart Pppp [40 CFR 63.4480 – 63.4581].
- c) Operational Restrictions
- (1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.
 - (2) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.
 - (3) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
 - (4) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
 - (5) The permittee shall develop and implement, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste



materials generated by the coating operations [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581]. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

- a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;
 - b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;
 - c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;
 - d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and
 - e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.
- (6) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]



(7) See 40 CFR, Part 63, Subpart Mmmm [40 CFR 63.3880 – 63.3981].

(8) See 40 CFR, Part 63, Subpart Pppp [40 CFR 63.4480 – 63.4581].

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit 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 monitor and recorder 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 permittee shall collect and record the following information each day the emissions unit is in operation:

- a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and
- b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

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

(2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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



- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

The operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for the controlled pollutant. In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

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

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
 - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, 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.
 - (6) The permittee shall conduct periodic inspections of the waterwash control 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.

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

- (9) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control 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.
- (10) The permittee shall collect and record the following information each month for this emissions unit:
 - a. The company identification for each coating and cleanup material employed in R001;
 - b. The VOC content of each coating and cleanup material, in pounds/gallon (excluding water and exempt solvents), as applied;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The total uncontrolled VOC emissions from each coating and cleanup material employed, in pounds $[d)(11)b. \times d)(11)c.]$;
 - e. The total stack (controlled) VOC emissions from all coating and cleanup materials employed, in pounds $[summation of d)(11)d. \times \text{the control efficiency from the most recent stack test}]$;



- f. The amount of sludge collected, in pounds;
- g. The total facility fugitive emissions of VOC resulting from the sludge, in tons, calculated as follows:
$$EF = 0.005 \text{ lb VOC/lb of sludge collected} \times [\text{the amount of sludge from d)(11)f. above}]/2000$$
where EF is the facility fugitive emissions of VOC attributed to paint sludge, in tons per month;
- h. The total VOC emissions generated at the facility (fugitive + stack), in tons [d)(11)e. + d)(11)g.];
- i. The total fugitive emissions of VOC generated off site and resulting from the sludge, in tons, calculated as follows:
$$Ef = 0.04 \text{ lb VOC/lb of sludge collected} \times [\text{the amt. of sludge from d)(11)f. above}]/2000$$
where Ef = the off-site fugitive emissions of VOC attributed to paint sludge, in tons per month;
- j. The total VOC emissions (fugitive emissions generated at the facility + stack emissions generated at the facility + fugitive emissions generated off-site), in tons [d)(11)h. + d)(11)i.]; and
- k. The rolling, 12-month summation of the total monthly VOC emission rates [calculated by summing the VOC emissions from d)(11)j. above, for the previous 11 calendar months + the VOC emissions for the current month], in tons.

(11) See 40 CFR, Part 63, Subpart Mmmm [40 CFR 63.3880 – 63.3981].

(12) See 40 CFR, Part 63, Subpart Pppp [40 CFR 63.4480 – 63.4581].

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - b. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit;
 - c. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in e)(1)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and



- e. an identification of each incident of deviation described in e)(1)a. where proper records were not maintained for the investigation and/or the corrective action(s).

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

- (2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
- (4) The permittee shall identify in the quarterly deviation report, all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation; and
 - b. All exceedances of the rolling, 12-month VOC emission limitation of 143.77 tons.

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

- (6) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981].
- (7) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

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:

- a. 95% control efficiency with 100% capture efficiency

- a. Applicable Compliance Method:

- a. The permittee has demonstrated compliance with the control and capture efficiency limitations based on the results of emissions testing conducted on May 4, 2010 (97.7% control efficiency and 100% capture efficiency). If required, the permittee shall demonstrate compliance with the control and capture efficiency



limitations by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

b. Emission Limitations:

28.2 lbs VOC/hour

Applicable Compliance Method:

The permittee has demonstrated compliance with the hourly VOC emission limitation based on the results of emissions testing conducted on May 4, 2010 (11.6 lbs VOC/hour, as xylene*). If required, the permittee shall demonstrate compliance with the control and capture efficiency limitations by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

*The company has noted that xylene was the primary component of the VOC emissions at the time of testing. Therefore, for testing purposes, the VOC emissions as carbon have been converted to VOC emissions as xylene for the purpose of comparison to the VOC emissions limit.

c. Emission Limitations:

2.0 lbsNOx/hour and 8.76 tons NOx/yr from the RTO stack

Applicable Compliance Method:

The permittee has demonstrated compliance with the hourly NOx limitation based on the results of emissions testing conducted on December 12 - 13, 2006 (1.24 lbsNOx/hour). If required, the permittee shall demonstrate compliance with the NOx limitation by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitations:

1.0 lbs PM10/hour and 4.38 tons PM10/year from the RTO stack

Applicable Compliance Method:

The permittee has demonstrated compliance with the hourly PM10 limitation based on the results of emissions testing conducted on December 12 - 13, 2006 (0.63 lbs PM10/hour). If required, the permittee shall demonstrate compliance with the PM10 limitation by testing in accordance with Methods 1 – 4 of 40 CFR Part 60, Appendix A, and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.



The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

e. Emission Limitations:

3.0 lbs CO/hour and 13.14 tons CO/year from the RTO stack

Applicable Compliance Method:

The hourly CO limitation was established based on the results of emissions testing conducted on December 12 - 13, 2006 (2.0 lbs CO/hour). If required, the permittee shall demonstrate compliance with the CO limitation by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

f. Emission Limitations:

143.77 tons VOC/year, based upon a rolling, 12-month summation of the monthly VOC emission rates [from the thermal oxidizer exhaust stack and fugitive emissions*, combined]. *This accounts for VOCs emitted from paint sludge at the facility, where the sludge is generated, and at the processing/disposal facility off site, combined.

Applicable Compliance Method:

The record keeping requirements specified in Section d)(11) of this permit shall be used to determine compliance with the rolling, 12-month VOC emission limitation.

g. Emission Limitations:

0.098 lbNOx/mmBtu and 3.77 tons NOx/year [from all natural gas combustion units not associated with the RTO stack]

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the NOx limitation by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu emission limitation, compliance with the annual emission limitation shall also be demonstrated.



h. Emission Limitations:

0.082 lb CO/mmBtu and 3.15 tons CO/year [from all natural gas combustion units not associated with the RTO stack]

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the CO limitation by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu emission limitation, compliance with the annual emission limitation shall also be demonstrated.

i. Emission Limitations:

0.0019 lb PM10/mmBtu and 0.09 ton PM10/year [from all natural gas combustion units not associated with the RTO stack]

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PM10 limitation by testing in accordance with Methods 1 – 4 of 40 CFR Part 60, Appendix A, and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu emission limitation, compliance with the annual emission limitation shall also be demonstrated.

j. Emission Limitations:

For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR 63.3891(a) through (c) and 40 CFR 63.3940 through 40 CFR 63.3968. [See 40 CFR 63.3880-3981.]

k. Emission Limitations:

For each existing TPO coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.



Final Permit-to-Install
Norplas Industries Inc.
Permit Number: P0114197
Facility ID: 0387000362
Effective Date: 1/14/2014

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR 63.4491(a) through(c) and 40 CFR 63.4540 through 40 CFR 63.4568. [See 40 CFR 63.4480-4581.]

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -Storage Tanks 1 & 2: T001,T002,

EU ID	Operations, Property and/or Equipment Description
T001	Solvent storage tank #1 (virgin)
T002	Solvent storage tank #2 (waste)

- 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.	OAC rule 3745-31-05(A)(3) (Administrative modification to PTI #P0105840, issued 7-26-2010, to correct the throughput limitations)	0.33 ton volatile organic compounds (VOC)/yr, for emissions unit T001; and 0.22 ton VOC/yr for emissions unit T002 See b)(2)a.
b.	OAC rule 3745-21-09(L)	See b)(2)b.
c.	40 CFR, Part 60, Subpart Kb	See b)(2)c.
d.	40 CFR, Part 63, Subpart Mmmm [40 CFR 63.3880 – 63.3981]	See b)(2)d., c)(2), d)(2) and e)(2)
e.	40 CFR 63.1 - 15 [40 CFR 63.3901]	Table 2 to Subpart Mmmm of 40 CFR, Part 63 – Applicability of General Provisions to Subpart Mmmm of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
f.	40 CFR, Part 63, Subpart Pppp [40 CFR 63.4480 – 63.4581]	See b)(2)e., c)(3), d)(3) and e)(3)
g.	40 CFR 63.1 – 63.15 [40 CFR 63.4501]	Table 2 to Subpart Pppp of 40 CFR, Part 63 – Applicability of General Provisions to Subpart Pppp of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

- (2) Additional Terms and Conditions



- a. The Best Available Technology (BAT) requirements for emissions units T001 and T002 have been determined to be compliance with the terms and conditions of this permit and compliance with 40 CFR, Part 63, Subpart Mmmm and 40 CFR, Part 63, Subpart Pppp.
- b. Emissions units T001 and T002 are exempt from the requirements of OAC rule 3745-21-09(L)(1) because they are fixed roof storage tanks with a capacity less than 40,000 gallons.
- c. This rule is not applicable to emissions units T001 and T002 because they are less than 75 cubic meters (19,813 gallons) in size.
- d. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Mmmm.

The final rules found in 40 CFR Part 63, Subpart Mmmm establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" under the Mmmm MACT regulations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

- e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Pppp.

The final rules found in 40 CFR Part 63, Subpart Pppp establish national emission standards for hazardous air pollutants (HAP), work practice standards,



operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" under the MACT PPPP regulations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.4483.

- f. The emission standards set forth in 40 CFR Part 63, Subparts M MMM and PPPP shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

- (1) The permittee shall not exceed a maximum annual material throughput rate of 225,000 gallons for emissions unit T001, and a maximum annual material throughput rate of 150,000 gallons for emissions unit T002.
- (2) See 40 CFR, Part 63, Subpart M MMM [40 CFR 63.3880 – 63.3981].
- (3) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581].

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount (in gallons per month and total gallons, to date for the calendar year) of material throughput for emissions units T001 and T002, individually.
- (2) See 40 CFR, Part 63, Subpart M MMM [40 CFR 63.3880 – 63.3981]
- (3) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. exceedances of the maximum annual material throughput rate of 225,000 gallons for emissions unit T001; and
 - b. exceedances of the maximum annual material throughput rate of 150,000 gallons for emissions unit T002.

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

- (2) See 40 CFR, Part 63, Subpart MMMM [40 CFR 63.3880 – 63.3981]
- (3) See 40 CFR, Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581]

f) Testing Requirements

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

0.33 ton VOC/yr for emission unit T001, and 0.22 ton VOC/yr for emission unit T002

Applicable Compliance Method:

The permittee shall demonstrate compliance through calculations of tank working and breathing losses as determined by U.S. EPA TANKS 4.09 program and records of actual material throughput as required in section d)(1).

g) Miscellaneous Requirements

- (1) None.