John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

2/3/2014

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: MSC Walbridge Coatings Inc
Facility ID: 0387000046
Permit Type: Renewal
Permit Number: P0115862

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
MSC Walbridge Coatings Inc

Facility ID:	0387000046
Permit Number:	P0115862
Permit Type:	Renewal
Issued:	2/3/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
MSC Walbridge Coatings Inc

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Authorization

Facility ID: 0387000046
Facility Description: Metal Coating and Allied Services
Application Number(s): A0048987
Permit Number: P0115862
Permit Description: Title V Renewal for Metal Coating and Allied Services
Permit Type: Renewal
Issue Date: 2/3/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087849

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

MSC Walbridge Coatings Inc
30610 East Broadway
Walbridge, OH 43465

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, 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 paragraph (E) of OAC rule 3745-77-03.

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 ofan 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 Ohio EPA DAPC, Northwest District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. There are no insignificant emissions units, with applicable requirements, at this facility.

C. Emissions Unit Terms and Conditions

1. B002, boiler #2

Operations, Property and/or Equipment Description:

natural gas/landfill gas fired boiler (rated maximum capacity of 7.321 mmBtu/hr) admin mod to remove NSPS WWW requirements for burning landfill gas

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 operations(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. 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) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	0.71 lb nitrogen oxides (NOx)/hr; 3.11 tons NOx/yr 0.60 lb carbon monoxide (CO)/hr; 2.63 tons CO/yr 0.04 lb organic compounds (OC)/hr; 0.18 ton OC/yr 0.75 lb sulfur dioxide (SO2)/hr; 3.29 tons SO2/yr 0.12 lb particulate emissions (PE)/hr; 0.53 ton PE/yr Visible PE shall not exceed 10% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	40 CFR, Part 63, Subpart DDDDD (40 CFR 63.7480-63.7575)	See b)(2)e., d)(2) and e)(2)
e.	40 CFR 63.1-15 (40 CFR 63.7565)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit, BAT has been determined to be compliance with the terms and conditions of this permit.

b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas* as fuel.

* "Treated" landfill gas is considered to be equivalent to natural gas.

e. Emissions unit B002 meets the definition of existing boilers or process heaters with a heat input capacity of less than 10 mmBtu per hour; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500 (a)(3), (f) and Table 3
General Compliance Requirements	63.7505(a), 63.7515(d), 63.7540(a)(11) and (a)(13), 63.7565 and Table 10

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

c) Operational Restrictions

(1) The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or "treated" landfill gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Record Keeping Requirements	63.7530(d), (e), (f), 63.7555(a), (i), (j), 63.7560(a), (b) and (c)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or "treated" landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Reporting Requirements	63.7530(d), (e), (f), 63.7545(a), (f), (h), 63.7550(a), (b), (c) and (h) and Table 9

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitations</u>:

0.71lb NOx/hr, 3.11 tons NOx/yr

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft3/hr) by the emission factor of 100 lbsNOx/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

b. Emissions Limitations:

0.60 lb CO/hr; 2.63 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft3/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

c. Emissions Limitations:

0.04 lb OC/hr; 0.18 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft3/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

d. Emissions Limitations:

0.75 lb SO2/hr; 3.29 tons SO2/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation by using the following equation:

SO2 = (ppmv) x (MW) x (DSCFM) x (1.5584 X 10E-07) at 680 deg F and 29.92 inches Hg (equation to convert ppm to lbs/hr)

where,

ppmv = the concentration of SO2 in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO2 (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (1600 ft3/minute)

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

e. Emissions Limitations:

0.12 lb PE/hr; 0.53 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 14,612 ft3/hr by the emission factor of 8.2 lbs PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then

dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

f. Emissions Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

g) Miscellaneous Requirements

(1) None.

2. P001, wet scrubber - EG

Operations, Property and/or Equipment Description:

exhaust collection from electrogalvanizing

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 operations(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. 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) (PTI #03-6307 issued on 04/29/1992)	1.49 lbs particulate emissions (PE)/hr, 6.53 tons PE/yr 0.097 lb zinc (Zn)/hr, 0.42 ton Zn/yr 0.046 lb nickel (Ni)/hr, 0.20 tons Ni/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	40 CFR, Part 63, Subpart WWWWWW (63.11504 – 63.11513) [In accordance with 40 CFR 63.11504(a) and 63.11504(b), this emissions unit is a new source, as defined in 40 CFR Part 63.11511, subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Plating and Polishing Operations]	See b)(2)c., c)(1), d)(16) and e)(2)
e.	40 CFR Part 63.1-15 (40 CFR 63.11510)	Table 1 to 40 CFR, Part 63, Subpart WWWWWW- Applicability of General Provisions to subpart WWWWWW shows which parts of the General Provisions in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		40 CFR 63.1-15.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of an impingement scrubber and mist eliminator, and compliance with the terms and conditions of this permit.

b. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The permittee shall comply with the applicable restrictions required under 40 CFR part 63, Subpart WWWWWW, including the following sections:

63.11507(a) and (g)	Standards and Management Practices
63.11508(b)	Management Practices and Equipment Standards

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWWWW]

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR part 63, Subpart WWWWWW, including the following sections:

63.11508(c) and (d)	Work Practice Requirements

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart WWWWWW]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable static pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than1.5 inches of water.

[OAC rule 3745-77-07(C)(1)]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 9.5 gallons per minute.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

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

j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

k. 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.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are 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 range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable restrictions required under 40 CFR part 63, Subpart WWWWWW, including the following sections:

63.11509(e) and (f)	Record Keeping Requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWWWW]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time (start time and date, and end time and date)when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a”or “b” where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a”or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR part 63, Subpart WWWWWW, including the following sections:

63.11508(a) and (c)	Notification and Reporting
63.11509(b), (c) and (d)	Notification and Reporting

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart WWWWWW]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

a. The emissions testing shall be conducted within 6 months the effective date of the permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for PE, Ni, and Zn.

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. for PE, Methods 1- 5 of 40 CFR, Part 60, Appendix A;

ii. for Ni, Methods 1-4 and 29 of 40 CFR, Part 60, Appendix A; and

iii. for Zn, Methods 1-4 and 29 of 40 CFR, Part 60, Appendix A.

d. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

e. The tests shall be conducted while the emissions unit is operating at its maximum capacity of 65 tons/hr, unless otherwise specified or approved by the Ohio EPA, NWDO.

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

g. Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid

characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

1.49lb PE/hr; 6.53 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs PE/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-6307]

b. Emissions Limitations:

0.046 lb Ni/hr; 0.20 ton Ni/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs Ni/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-6307]

c. Emissions Limitations:

0.097 lb Zn/hr; 0.42 ton Zn/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs Zn/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-6307]

d. Emissions Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

[OAC rule 3745-77-07(C)(1) and PTI #03-6307]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -25.1 mmBtu/hr NG/LFG Boilers: B001,B003,

EU ID	Operations, Property and/or Equipment Description
B001	natural gas/landfill gas fired boiler (rated maximum capacity of 25.1 mmBtu/hr) admin mod to remove NSPS WWW requirements for burning landfill gas
B003	natural gas/landfill gas fired boiler (rated maximum capacity of 25.1 mmBtu/hr) admin mod to remove NSPS WWW requirements for burning landfill gas

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 operations(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. 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) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	<u>From each emissions unit individually</u> 2.44 lbs nitrogen oxides (NOx)/hr; 10.69 tons NOx/yr 2.05 lbs carbon monoxide (CO)/hr; 8.98 tons CO/yr 0.13 lb organic compounds (OC)/hr; 0.57 ton OC/yr 2.39 lbs sulfur dioxide (SO2)/hr; 10.47 tons SO2/yr 0.41 lb particulate emissions (PE)/hr; 1.80 tons PE/yr Visible PE shall not exceed 10% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	40 CFR, Part 63, Subpart DDDDD (40 CFR 63.7480-63.7575)	See b)(2)e., d)(2) and e)(2)
e.	40 CFR 63.1-15	Table 10 to Subpart DDDDD of 40 CFR

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.7565)	Part 63 – Applicability of General Provisions to Subpart DDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.

b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas* as fuel.

* "Treated" landfill gas is considered to be equivalent to natural gas.

e. Emissions units B001 and B003 meet the definition of existing boilers or process heaters with a heat input capacity of greater than 10 mmBtu per hour; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500 (a)(3), (f) and Table 3
General Compliance Requirements	63.7505(a), 63.7515(d), 63.7540(a)(10) and (a)(13), 63.7565 and Table 10

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

c) Operational Restrictions

(1) The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or "treated" landfill gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Record Keeping Requirements	63.7530(e), (f), 63.7555(a), (i), (j),63.7560(a), (b) and (c)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or "treated" landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Reporting Requirements	63.7530(e), (f), 63.7545(a), (f), (h),63.7550(a), (b), (c) and (h) and Table 9

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitations</u>:

2.44 lbsNOx/hr, 10.69 tons NOx/yr from each emissions unit individually

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft3/hr) by the emission factor of 100 lbsNOx/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

b. Emissions Limitations:

2.05 lbs CO/hr; 8.98 tons CO/yr from each emissions unit individually

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft3/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

c. Emissions Limitations:

0.13 lb OC/hr; 0.57 ton OC/yr from each emissions unit individually

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft3/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-2 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

d. Emissions Limitations:

2.39 lbs SO2/hr; 10.47 tons SO2/yr from each emissions unit individually

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation by using the following equation:

SO2 = (ppmv) x (MW) x (DSCFM) x (1.5584 X 10E-07) at 680 deg F and 29.92 inches Hg (equation to convert ppm to lbs/hr)

where,

ppmv = the concentration of SO2 in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO2 (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (5100 ft3/minute)

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation above based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

e. Emissions Limitation:

0.41 lb PE/hr; 1.80 tons PE/yr from each emissions unit individually

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 50,228 ft3/hr by

the emission factor of 8.2 lb PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

f. Emissions Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -65 mmBtu/hr NG Paint Curing Oven: K001,K002

EU ID	Operations, Property and/or Equipment Description
K001	prime paint roll coating application with 65 mmBtu/hr NG fired paint curing oven with thermal oxidizer incinerator
K002	finish paint roll coating application with 65 mmBtu/hr NG fired paint curing oven with thermal oxidizer incinerator

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 operations(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. 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 3745-31-05(A)(3) (PTI #03-746, issued on 05/04/1979)	37 lbs volatile organic compounds (VOC/hr), 125 tons VOC/yr, for emissions units K001 and K002, combined See b)(2)a.
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.
c.	40 CFR, Part 63, Subpart SSSS (40 CFR 63.5080-5190) [In accordance with 40 CFR 63.5080(a), this emissions unit is a coil coating line subject to the emissions limitations/control measures specified in Subpart SSSS.]	Limit organic HAP emissions to: No more than 2 % of the organic HAP applied for each month during each 12-month compliance period (98% reduction); or No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or If an oxidizer is used to control organic HAP emissions, the oxidizer should be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 %.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		[40 CFR 63.5120(a)] Demonstrate compliance with one of these standards by following the applicable procedures in 63.5170. [40 CFR 63.5120(b)] Compliance shall be maintained at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. [40 CFR 63.5140(a)] See b)(2)c.
d.	40 CFR, Part 63.1-15 [40 CFR, Part 63.5140(b)]	Table 2 to 40 CFR, Part 63.5140 – Applicability of General Provisions to Subpart SSSS – provides cross references to subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit, BAT has been determined to be use of a thermal incinerator, and compliance with the terms and conditions of this permit.

b. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (E) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to 40 CFR, Part 63, Subpart SSSS. Also, the monitoring, record keeping and reporting requirements established under OAC rule 3745-21-09(B)(6) are less stringent than those established pursuant to 40 CFR, Part 63, Subpart SSSS, except for the frequency of reporting. Therefore, the frequency of reporting shall continue to be quarterly, as established under OAC 3745-21-09(B)(6).

c. The permitteehas elected the compliance option provided by 40 CFR 63.5120(a)(2) - no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period. This is accomplished through the use of a combination of compliant coatings and control devices (oxidizer) and maintaining an acceptable equivalent emissions rate in

accordance with the procedures in 40 CFR 63.5170(d). The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of other compliance options as identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120.

c) Operational Restrictions

(1) The use of cleanup material shall not exceed 14,600 gallons/year.

[OAC rule 3745-77-07(A)(1) and PTI #03-746]

(2) This emissions unit shall burn natural gas and/or oven emissions only.

[OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart SSSS, including the following sections:

63.5121(a)	Requirement to meet operating limits established during performance testing, at all times, as specified in Table 1 to Subpart SSSS of Part 63, Operating Limits if Using Add-on Control Devices and Capture System, and to establish the operating limits during the performance test according to the requirements in 63.5160(d)(3).

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart SSSS]

(4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate operating requirements for the selected option. See 40 CFR, Part 63, Subpart SSSS (40 CFR 63.5080-5190).

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart SSSS]

(5) Coatings that contain organic HAP materials shall be used only when the oxidizer is operating.

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart SSSS]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all the coatings employed in emissions units K001 and K002, combined:

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

b. the VOC content of each coating employed, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the VOC emissions rate for each coating employed [d)(1)b. x d)(1)c. x (1 - the control efficiency demonstrated in the most recent compliance test)], in pounds;

e. the total VOC emissions rate for all the coatings employed [summation of d)(1)d. for all coatings], in lbs or tons; and

f. the annual year to date VOC emissions for all the coatings employed, for emissions units K001 and K002, combined [summation of d)(1)e. for K001 and K002, for each calendar month to date from January to December], in tons.

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each month for cleanup operations, for emissions units K001 and K002, combined:

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

b. the VOC content of each cleanup material employed, in pounds per gallon;

c. the number of gallons of each cleanup material employed;

d. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)c.);

e. the total VOC emissions from all cleanup materials employed [the summation of d)(2)d. for all cleanup materials], in pounds or tons;

f. the annual year to date VOC emissions from the cleanup operations, in tons per year [summation of d)(2)e. for each calendar month to date from January to December]; and

g. the annual, year to date number of gallons of cleanup material used [summation of d)(2)c. for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall collect and record the annual year to date VOC emissions from the coating and cleanup operations, in tons per year [summation of d)(1)f. and d)(2)f.], for emissions units K001 and K002, combined.

[OAC rule 3745-77-07(C)(1)]

(4) For each day during which the permittee burns a fuel other than natural gas and/or oven emissions, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1)]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR, Part 63, Subpart SSSS, including the following sections:

63.5150(a)(1)	Bypass monitoring
63.5150(a)(3)	Temperature monitoring of oxidizers
63.5150(a)(4)	Capture system monitoring
63.5150(b)	Deviation from the monitoring requirements of 5150(a)(3) or (a)(4) is considered a deviation from the operating limit
63.5170(d)(3)	Compliance demonstration procedures as specified in 63.5170(f) and (g).
63.5170(g)(3)(i), (ii), and (iii)(B)	Compliance demonstration using performance test and continuous monitoring of operating parameters .
63.5170(f)(1)(i) through (v), (ix) and (h)	Methodology for calculating the organic HAP emissions rate on a monthly basis in order to demonstrate compliance with the limit of 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period.
63.5190(a)(1)	Requirement to record compliance option used, along with the beginning and ending dates and times each option was used.
63.5190(a)(2)(ii)	Requirement to keep records needed to demonstrate compliance with control device and capture system operating parameter data in accordance with 63.5150(a)(1), (a)(3), and (a)(4).
63.5190(a)(2)(iii)	Requirement to keep records of organic HAP content data for the purpose of demonstrating compliance in accordance with 63.5160(b).
63.5190(a)(2)(iv)	Requirement to keep records of volatile matter and solids content data for the purpose of demonstrating compliance in

	accordance with 63.5160(c).
63.5190(a)(2)(v)	Requirement to keep record of overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency test in accordance with 63.5160(d), (e), and (f).
63.5190(a)(2)(vi)	Requirement to keep records of material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 63.5170(a), (b), and (d).
63.5190(a)(3)	Requirement to keep records specified in 63.10(b)(3).

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart SSSS]

(6) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. See 40 CFR, Part 63, Subpart SSSS (40 CFR 63.5080-5190).

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart SSSS]

e) Reporting Requirements

(1) The permittee shall submit an annual summary report that identifies the following:

a. the actual annual VOC emissions from the coating operations for emissions units K001 and K002, combined;

b. the actual annual VOC emissions from the cleanup operations for emissions units K001 and K002, combined;

c. the total actual annual VOC emissions from the coating and cleanup operations for emissions units K001 and K002, combined; and

d. the total actual annual number of gallons of cleanup materials used.

This annual report shall be submitted by January 31 of each year to the Ohio EPA-NWDO, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or oven emissions were burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR, Part 63, Subpart SSSS, per the following sections:

63.5180(b)	Initial notification report
63.5180(c)	Notification of performance test
63.5180(d)	Notification of compliance status
63.5180(e)	Requirement to submit performance test reports as specified in 63.10(d)(2)
63.5180(f)	Requirement to submit start-up, shutdown, and malfunction reports as specified in 63.10(d)(5)
63.5180(g)	Requirement to submit semi-annual reports: compliance report dates and required content
63.5180(h)	Semi-annual report: information requirement for each deviation occurring at an affected source without a CEMS

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart SSSS]

(4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. See 40 CFR, Part 63, Subpart SSSS (40 CFR 63.5080-5190).

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart SSSS]

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

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

a. The emissions testing shall be conducted 2.5 years after the effective date of the permit.

b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for VOC, and shall include the capture and control efficiencies of the control equipment.

c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. For VOC, Methods 1-4 and 18, 25, or 25C of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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

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

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

(2) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

37 lbs VOC/hr, 125 tons VOC/yr, for emissions units K001 and K002, combined

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in condition f)(1) of this permit.

Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements established in section d)(1) and d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

b. Emissions Limitations:

Limit organic HAP emissions to:

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

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

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

Applicable Compliance Method:

The permitteeshall demonstrate compliance with f)(2)(b)(ii) [0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period] through the use of a combination of capture system and control device (oxidizer) to control organic HAP emissions and compliant coatings, in accordance with the procedures in 40 CFR 63.5170(d). A performance test to determine the control device destruction or removal efficiency (DRE), and capture efficiency, using the applicable test methods and procedures in 40 CFR 63.5160(d) and (e), shall be conducted in accordance with the performance testing required in condition f)(1) of this permit. Capture and control efficiencies are ensured through the monitoring of oxidizer temperature and compliance with the Capture System Monitoring Plan dated August 2006, according to 40 CFR 63.5150(a)(3) and (a)(4).

If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall demonstrate and maintain compliance with the appropriate testing requirements for the selected option. See 40 CFR, Part 63, Subpart SSSS (40 CFR 63.5080-5190).

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart SSSS]

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to Subpart SSSS, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f).

[40 CFR, Part 63.5121(b)]