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

4/22/2014

Certified Mail

Mr. John Padget
Iten Industries, Inc. - Plant 1
P.O. Box 2150
Ashtabula, OH 44005

Facility ID: 0204010112
Permit Number: P0084077
County: Ashtabula

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 3/20/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0204010112
Facility Name:	Iten Industries, Inc. - Plant 1
Facility Description:	Plastic parts manufacturer
Facility Address:	4001 Benefit Ave Ashtabula, OH 44005 Ashtabula County
Permit:	P0084077, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Star Beacon on 03/21/2014. The comment period ended on 04/20/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Iten Industries, Inc. - Plant 1

Facility ID:	0204010112
Permit Number:	P0084077
Permit Type:	Renewal
Issued:	4/22/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Iten Industries, Inc. - Plant 1

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 12
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 23
1. K004, Treater # 4 24
2. P003, Phenolic Resin Mixing 42
3. P006, Politen mixer 44
4. P008, Sly Dust Collector 49
5. P017, GenSET (RICE) 52
6. P019, Cold Cleaning Operations 69
7. P020, Politen Mixer #2 73
8. Emissions Unit Group -Closed Molding: P013, P014 and P015 79
9. Emissions Unit Group -Treaters 1 & 2: K001 and K002 83

Authorization

Facility ID:	0204010112
Facility Description:	Plastic parts manufacturer
Application Number(s):	A0014578, A0049561
Permit Number:	P0084077
Permit Description:	Renewal Title V permit for a manufacturer of laminates.
Permit Type:	Renewal
Issue Date:	4/22/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0084075

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

Iten Industries, Inc. - Plant 1
4001 Benefit Ave
Ashtabula, OH 44005

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

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

The above named entity is hereby granted 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, Northeast 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
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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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. The following insignificant emissions units are located at this facility:

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and/or 40 CFR Part 60 or 63.

   Emissions units: B002, B004, B005, B006 and K003.

   [Authority for term: OAC rule 3745-77-07(A)(13)]

3. The following emissions units as well as containers storing HAP-containing materials are subject to 40 CFR Part 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants for Major Sources: Reinforced Plastic Composites Production): P006, P013 – P015, P019 and P020. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

   [Authority for term: 40 CFR, Part 63, Subpart WWWW]

4. 40 CFR Part 63, Subpart WWWW – Operational Restrictions for the facility-wide work practice standards:

   a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store HAP-containing materials closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

      [Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW]

5. 40 CFR Part 63, Subpart WWWW – Monitoring and/or Recordkeeping Requirements for facility-wide workpractice standards:

   a) The permittee shall perform daily inspections when in operation of all containers that store HAP-containing materials, and record the following information:

      (1) the date and reason why any required inspection was not performed;

      (2) the date and all times when containers that store HAP-containing materials were not closed or covered, except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety; and

(3) information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW]

6. 40 CFR Part 63, Subpart WWWW – Reporting Requirements for facility-wide work practice standards:

a) The permittee must submit the following semiannual compliance reports:

(1) if there are no deviations from this work practice standard in B.4.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store HAP-containing materials were closed or covered during the reporting period); and

(2) if there were deviations with this work practice standard in B.4.a), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart WWWW]

7. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart WWWW, including the following sections:

§63.5915(a)	copy of compliance notification(s) and report(s)
§63.5915(d)	certified statement of compliance with work practice requirements
§63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW]

8. The following emissions units as well as containers storing HAP-containing materials are subject to OAC rule 3745-21-25 (Control of VOC emissions from reinforced plastic composites production operations): P006, P013 – P015, P019 and P020.

[Authority for term: OAC rule 3745-21-25]

9. OAC rule 3745-21-25 – Operational Restrictions for the facility-wide work practice standards:

a) For all fiberglass reinforced plastic operations, the permittee must keep all containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-25]

10. OAC rule 3745-21-25 – Monitoring and/or Recordkeeping Requirements for facility-wide work practice standards:

    a) The permittee shall perform daily inspections when in operation of all containers that store VOC-containing materials, and record the following information:

        (1) the date and reason why any required inspection was not performed;

        (2) the date and all times when containers that store VOC-containing materials were not closed or covered, except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety; and

        (3) information on the duration and cause of each deviation and the corrective action taken.

    [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

11. OAC rule 3745-21-25 – Reporting Requirements for facility-wide work practice standards:

    a) The permittee must submit the following semiannual compliance reports:

        (1) if there are no deviations from the work practice standard in B.9.a), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., all containers that store VOC-containing materials were closed or covered during the reporting period); and

        (2) if there were deviations with the work practice standard in B.9.a), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

    Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

    [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

12. The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

13. The following emissions units are subject to 40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants for Major Sources: Paper and Other Web Coating): K001 – K004. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

    [Authority for term: 40 CFR Part 63, Subpart JJJJ]

14. The following emissions unit is subject to 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines):

    P017 – 526 HP natural gas fired RICE
    P022 – 625 HP diesel fired emergency RICE

    The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

    [Authority for term: 40 CFR Part 63, Subpart ZZZZ]

15. The following emissions units are subject to 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters):

    B002 – 7.0 mmBtu/hr natural-gas process heat boiler
    B004 – 5.2 mmBtu/hr natural-gas process heat boiler
    B005 – 7.3 mmBtu/hr natural-gas process heat boiler
    B006 – 7.3 mmBtu/hr natural-gas process heat boiler

    The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

    a) The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced

construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

b) The above boilers are designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boilers are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

c) The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

C. Emissions Unit Terms and Conditions

1. K004, Treater # 4

Operations, Property and/or Equipment Description:

Treater # 4

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(B)(6) (fabric and paper coating, using capture and control system), in lieu of complying with VOC limitations in OAC rule 3745-21-09(F) and OAC rule 3745-21-09(G)	The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.
b.	OAC rule 3745-21-09(F)(2)(a)(i) For paper coating	The control system shall reduce VOC emissions from the paper coating line by at least 90 percent.
c.	OAC rule 3745-21-09(F)(2)(b) For paper coating	See c)(2)
d.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3320) [Always-controlled work station]	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in40 CFR 63.3320, Subpart JJJJ. i. No more than 5 percent of the organic HAP applied for each month (95% reduction) at existing affected sources; or ii. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or iii. No more than 20 percent of the mass of coating solids applied for each

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month at existing affected sources; or iv. Operate the thermal oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent. See b)(2)a.
e.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280-3420), Table 1	Operating limits, using add-on control devices and capture system. See b)(2)c, b)(2)d, b)(2)e and c)(3).
f.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280-3420), Table 2	Applicability of General Provisions, Subpart A, 40 CFR Part 63.1-15.
g.	40 CFR Part 64 Compliance Assurance Monitoring	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emission limitations in OAC rule 3745-21-09(B)(6) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.
h.	OAC rule 3745-31-05(A)(3) (PTI 02-4870)	VOC emissions shall not exceed 8.4 lbs/hr, 203 lbs/day and 37 tons/yr.

(2) Additional Terms and Conditions

a. The permittee must demonstrate compliance by following the procedures in 40 CFR 63.3370.

b. All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device.

d. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “ii”, shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

e. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

c) Operational Restrictions

(1) The thermal oxidizer shall be operated at all times when the emissions unit is in operation.

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

(2) Work practice standards for cleaning materials.

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety percent, any person using an organic solvent for cleanup shall:

a. store all VOC containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emission from cleaning of storage, mixing and conveying equipment.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)(b)]

(3) The permittee shall comply with all applicable operational limits of 40 CFR Part 63, Subpart JJJJ, including the following sections:

§ 63.3321(a) and Table 1 of 40 CFR 63, Subpart JJJJ	The thermal oxidizer's average temperature in any 3-hour period must not fall below the combustion temperature operating limit established during the most recent performance test that demonstrated compliance. [During the July 17, 2008, performance test, the combustion temperature operating limit was established at 1400°F.]
§ 63.3321(a) and Table 1 of 40 CFR 63, Subpart JJJJ	The permittee must meet the operating limit(s) that have been established in the monitoring plan developed by the facility for the emission capture system(s).
§ 63.3321(a)	The permittee shall meet the operating limits at all times after establishing them.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJ]

(4) The permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 51, Appendix M, Method 204]

(5) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 51, Appendix M, Method 204]

d) Monitoring and/or Recordkeeping Requirements

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

§ 63.3350 If I use a control device to comply with the emission standards, what monitoring must I do?	
§ 63.3350(e)	Continuous parameter monitoring system (CPMS). If you are using a control device to comply with the emission standards in § 63.3320, you must install, operate, and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of this section according to the requirements in paragraphs (e)(1) through (8) of this section.
§ 63.3350(e)(1)	Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
§ 63.3350(e)(2)	You must have valid data from at least 90 percent of the hours during which the process operated.
§ 63.3350(e)(3)	You must determine the hourly average of all recorded readings according to paragraphs (e)(3)(i) and (ii) of this section. (e)(3)(i) To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control. (e)(3)(ii) Provided all of the readings recorded in accordance with paragraph (e)(3) of this section clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
§ 63.3350(e)(4)	To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

§ 63.3350(e)(5)	You must record the results of each inspection, calibration, and validation check of the CPMS.
§ 63.3350(e)(6)	At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
§ 63.3350(e)(7)	Data recorded during monitoring malfunctions, associated repairs, out-of control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
§ 63.3350(e)(8)	Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation.
§ 63.3350(e)(9)	Oxidizer. If you are using an oxidizer to comply with the emission standards, you must comply with paragraphs (e)(9)(i) through (iii) of this section.
§ 63.3350(e)(9)(i)	Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.
§ 63.3350(e)(9)(ii)	For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1° Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
§ 63.3350(e)(10)	Other types of control devices. Ifyou use a control device other than anoxidizer or wish to monitor analternative parameter and comply witha different operating limit, you mustapply to the Administrator for approvalof an alternative monitoring methodunder § 63.8(f).

§ 63.3350(f)	Capture system monitoring. If you are complying with the emission standards in § 63.3320 through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in paragraphs (f)(1) and (2) of this section for these capture systems. You must monitor the capture system in accordance with paragraph (f)(3) of this section. You must make the monitoring plan available for inspection by the permitting authority upon request.
§ 63.3350(f)(1)	The monitoring plan must: (i) Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and (ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and (iii) Identify the specific monitoring procedures.
§ 63.3350(f)(2)	The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in § 63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
§ 63.3350(f)(3)	You must conduct all capture system monitoring in accordance with the plan.
§ 63.3350(f)(4)	Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
§ 63.3350(f)(5)	You must review and update the capture system monitoring plan at least annually.

§ 63.3370 How do I demonstrate compliance with the emission standards?		
If you choose to demonstrate compliance by:	Then you must demonstrate that:	To accomplish this:

(a)(1) Use of ''as-purchased'' compliant coating materials.	(i) Each coating material used at an existing affected source does not exceed 0.04 lb organic HAP per lb coating material as-purchased; or (ii) Each coating material used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-purchased.	Follow the procedures set out in § 63.3370(b). Follow the procedures set out in § 63.3370(b).
(a)(2) Use of ''as-applied'' compliant coating materials.	(i) Each coating material used at an existing affected source does not exceed 0.04 lb organic HAP per lb coating material as-applied; or (ii) Each coating material used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-applied; or (iii) Monthly average of all coating materials used at an existing affected source does not exceed 0.04 lb organic HAP per lb coating material as-applied on a monthly average basis; or (iv) Monthly average of all coating materials used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-applied on a monthly average basis.	Follow the procedures set out in § 63.3370(c)(1). Use either Equation 1a or b of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(i). Follow the procedures set out in § 63.3370(c)(2). Use Equations 2 and 3 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(i). Follow the procedures set out in § 63.3370(c)(3). Use Equation 4 of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(ii). Follow the procedures set out in § 63.3370(c)(4). Use Equation 5 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(ii).
(a)(3) Tracking total monthly organic HAP applied	Total monthly organic HAP applied does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(d).Show that total monthly HAP applied (Equation 6 of § 63.3370) is less than the calculated equivalent allowable organic HAP (Equation 13a or b of § 63.3370).
(a)(4) Use of a capture system and control	(i) Overall organic HAP control efficiency is equal to 95 percent at an existing affected source on a monthly basis; or oxidizer outlet	Follow the procedures set out in § 63.3370(e) to determine compliance with § 63.3320(b)(1) according to § 63.3370(j) if using

device	organic HAP concentration is no greater than 20 ppmv by compound and capture efficiency is 100 percent; or operating parameters are continuously monitored; or	a control device and CPMS, or § 63.3370(k) if using an oxidizer.
	(ii) Overall organic HAP emission rate does not exceed 0.2 lb organic HAP per lb coating solids for an existing affected source on a monthly average as-applied basis;	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(k) if using an oxidizer.
	(iii) Overall organic HAP emission rate does not exceed 0.04 lb organic HAP per lb coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(k) if using an oxidizer.
	(iv) Overall organic HAP emission rate does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370). Calculate the monthly organic HAP emission rate according to § 63.3370(k) if using an oxidizer.
(a)(5) Use of multiple capture and/or control devices.	(i) Overall organic HAP control efficiency is equal to 95 percent at an existing affected source and 98 percent at a new affected source on a monthly basis; or	Follow the procedures set out in § 63.3370(e) to determine compliance with § 63.3320(b)(1) according to § 63.3370(e)(1) or (2).
	(ii) Average equivalent organic HAP emission rate does not exceed 0.2 kg organic HAP per kg coating solids for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(n).
	(iii) Average equivalent organic HAP emission rate does not exceed 0.04 kg organic HAP per kg coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(n).

	(iv) Average equivalent organic HAP emission rate does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370) according to § 63.3370(n).
(a)(6) Use of a combination of compliant coatingsand control devices.	(i) Average equivalent organic HAP emission rate does not exceed 0.2 lb organic HAP per lb coating solids for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(n).
	(ii) Average equivalent organic HAP emission rate does not exceed 0.04 lb organic HAP per lb coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(n).
	(iii) Average equivalent organic HAP emission rate does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370) according to § 63.3370(n).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) In order to maintain compliance with the applicable emission limitation contained in b)(1)a, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[During the July 17, 2008, performance test, the average combustion temperature of the thermal oxidizer was measured at 1400°F. Therefore, acceptable average combustion temperature within the thermal oxidizer shall not fall below 1350°F for any 3-hour block of time when the emissions unit is operating.]

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09]

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

(4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the limit established in d)(2), 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 operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date 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 temperature 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.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 51, Appendix M, Method 204]

(6) The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 51, Appendix M, Method 204]

(7) The permittee shall perform monthly checks of the storage areas for all VOC-containing cleaning materials and used shop towels and cleaning storage, mixing, and conveying equipment to ensure continuing compliance with the work practice standards applicable to organic solvent cleaning materials used outside the permanent enclosure. Records shall be kept of each monthly check, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 02-4870, issued on November 7, 1990 for emissions unit K004: d)(1) through d)(7). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(l)]

(2) The permittee shall identify the following information in the quarterly deviation report:

a. all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure;

b. all periods of time during which an access door and/or window, not qualifying as a natural draft opening, was left open during operations; and

c. all weekly average facial velocity readings at natural draft openings that were less than 200 feet per minute.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart JJJJ, pursuant to the following sections:

§63.3400 What notifications and reports must I submit?	
§63.3400(c)	You must submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section.
§63.3400(c)(1)	semi-annual compliance reports
§63.3400(c)(2)	The compliance report must contain the information in paragraphs (c)(2)(i) through (vi) of this section: (i) Company name and address. (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report. (iii) Date of report and beginning and ending dates of the reporting period. (iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted. (v) For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(2)(i) through (iii) of this section, and: (A) The total operating time of each affected source during the reporting period.

	(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken. (C) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.
§63.3400(g)	You must submit startup, shutdown, and malfunction reports as specified in § 63.10(d)(5), except that the provisions in subpart A of this part pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.
§63.3400(g)(1)	If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by § 63.6(e)(3), the owner or operator must state such information in the report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(4) The permittee shall submit quarterly deviation (excursion) that identify any observeddeviations from the required organic solvent cleaning materials work practices, thecause(s) and the corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 02-4870, issued on November 7, 1990 for emissions unit K004: e)(1) through e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

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

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in40 CFR 63.3320, Subpart JJJJ. See b)(1)d.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

§ 63.3360	What performance tests must I conduct?

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

c. Emission Limitations:

VOC emissions shall not exceed 8.4 lbs/hr, 203 lbs/day and 37 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitations shall be demonstrated based upon emission testing performed in accordance with the requirements specified in f)(2).

The daily emission limitation was developed by multiplying the lbs/hr emission limitation by a maximum daily operating schedule of 24 hrs/day. Therefore, provided compliance is shown with hourly emission limitation, compliance with the daily limitation shall also be demonstrated.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

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

   i. capture efficiency of PTE(s): 40 CFR Part 60, Appendix A, Method 204;

   ii. control efficiency of thermal oxidizer: 40 CFR Part 60, Appendix A, Method 25, or 25A;

   iii. pre-controlled VOC emissions from K004: 40 CFR Part 60, Appendix A, Method 25, or 25A, and;

   iv. 40 CFR Part 60, Appendix A, Methods 1 through 4.

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

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

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 02-4870, issued on November 7, 1990 for emissions unit K004: f)(1)a, f)(1)b, f)(1)c and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in these Permits to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P003, Phenolic Resin Mixing

Operations, Property and/or Equipment Description:

Phenolic Resin Mixing

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.

(2) Additional Terms and Conditions

a. Ohio EPA has initiated a review of this rule pursuant to Ohio Revised Code (ORC) 119.032 (five year rule review requirements).

This rule identifies emissions unit P003 as having the following requirements:

“This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.”

Ohio EPA is proposing to amend this rule, in part, by delisting emissions unit P003 from this rule. Based on the Ohio Supreme Court’s decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234, this mixing operation is not involved in "employing, applying, evaporating or drying" photochemically reactivematerial, since there are no chemical reactions taking place during mixing.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) None.

3. P006, Politen mixer

Operations, Property and/or Equipment Description:

Resin mixing for fiberglass reinforced plastic operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-869)	The Best Available Technology (BAT) Determination is compliance with the applicable OAC rule.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1)a,c)(1)b and c)(1)c.
c.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 1.78 lbs/hr.
f.	OAC rule 3745-21-25(D)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1)a, c)(1)b and c)(1)c.

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate control, fabric filter system whenever thisemissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

a. use mixer covers with no visible gaps present in the mixer covers, except thatgaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

b. close any mixer vents when actual mixing is occurring, except that venting isallowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and

c. keep the mixer covers closed while actual mixing is occurring except whenadding materials or changing covers to the mixing vessels.

[Authority for term: OAC rule 3745-77-07(A)(1),OAC rule 3745-21-25(D)and 40 CFR Part 63, Subpart WWWW].

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart WWWW]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-25]

(3) The permittee shall maintain the following monthly records for each emissions unit:

a. the company identification for each resin paste;

b. pounds of each resin paste mixed;

c. the weight percent of available VOC monomer (e.g., styrene, methyl methacrylate) for each resin paste mixed; and

d. the total VOC emission rate for all resin paste mixed, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n}[(W)(P)]i \text{ x EF}$$

where:

W = the weight of each resin paste applied, as recorded in d)(3)b;
P = the percent of available VOC monomer, by weight, of each resin paste, as recorded in d)(3)c;
i = pounds of available VOC monomer in each resin paste, i, mixed;
n = number of resin paste mixed; and
EF = each emission factor.

EF = emission factor of 0.25%. The emission factor of 0.25% of available HAP (VOC monomer) is taken from Table 5-2, "Average HAP emission Equations by Process" in US EPA's document "Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites Backgrounds Information Document for Proposed Standards"

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and

e. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall record the date and all times the fabric filter was not in service to control PE when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were any deviations with the work practice standards in c)(1)a, c)(1)b or c)(1)c, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services)by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1),OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW]

(2) The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

Particulate emissions shall not exceed 1.78 lbs/hr.

Applicable Compliance Method:

If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Opacity Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P008, Sly Dust Collector

Operations, Property and/or Equipment Description:

Cut-off saw for trimming plastic sheets

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-2151)	Particulate emissions from any stack serving this emissions unit shall not exceed0.010 grain per dry standard cubic foot of exhaust gases
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)	The requirements of OAC rule 3745-17-11(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Opacity Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions from any stack serving this emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases

Applicable Compliance Method:

If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P017, GenSET (RICE)

Operations, Property and/or Equipment Description:

526 HP Gen Set SITA (CoGen), 4 stroke rich burn (4SRB), reciprocating internal combustion engine (RICE), equipped with a catalytic converter

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary internal combustion engine (ICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The stationary spark ignition (SI) 4-stroke rich burn (4SRB), natural gas, reciprocating internal combustion engine (RICE), located at a major source for hazardous air pollutants (HAPs), shall be operated and maintained in continuous compliance with the emission standards and applicable requirements of 40 CFR Part 63, Subpart ZZZZ.
b.	40 CFR 63.6600(a) Table 1a #1 to Subpart ZZZZ Table 1b #1 to Subpart ZZZZ	Emissions of formaldehyde shall not exceed 350 ppbvd at 15% O_2 or shall be reduced by 76% or more. Compliance with the formaldehyde standard may be demonstrated by using Method 25A (reported as propane) during the performance test and demonstrating the average reduction of total hydrocarbon emissions (THC) to be 30% or greater. See c)(3).
c.	OAC rule 3745-31-05(A)(3) (PTI 02-19131)	Nitrogen oxides (NO_x) emissions from the stack shall not exceed 0.098 lb/hr and 0.43 ton/yr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Carbon monoxide (CO) emissions from the stack shall not exceed 1.00 lb/hr and 4.38 tons/yr. Sulfur dioxide (SO_2) emissions from the stack shall not exceed 0.0026 lb/hr and 0.011 ton/yr. Organic compounds (OC) emissions from the stack shall not exceed 0.13 lb/hr and 0.57 ton/yr. Particulate emissions (PE) from the stack shall not exceed 0.310 lb/million Btu of actual heat input and 6.00 tons/yr.
d.	OAC rule 3745-17-11(B)(5)(a)	The emission limitation required by this applicable rule is equivalent to the lb/mmBtu emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-04(F)(4)	Exempt in accordance with OAC rule 3745-18-06(B).
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from thebuilding shall notexceed 20% opacity as a 3-minute average.

(2) Additional Terms and Conditions

a. The permittee shall control the emissions of formaldehyde from the stationary RICE exhaust using a non-selective catalytic reduction (NSCR) device. The permittee shall either reduce formaldehyde emissions by 76% or limit the concentration of formaldehyde to 350 ppbvd or less at 15% O_2. Any alternative control technology must be approved by the Administrator of the U.S. EPA.

b. The stationary spark ignition (SI) reciprocating internal combustion engine (RICE), located at a major source for HAPs, is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. Requirements of the NESHAP include performance testing to demonstrate compliance with the exhaust concentration limit or control requirement for formaldehyde, as identified in Table 1a #1 to the subpart; and demonstrating

continuous compliance (as required in Table 6) by monitoring and maintaining the pressure drop across the catalyst and continuously monitoring the temperature at the catalyst inlet and recording the average 4-hour rolling temperature using a continuous parameter monitoring system (CPMS) in accordance with 40 CFR 63.6625(b). Thestationary SIRICE is subject to and shall be operated in compliance with all the applicable requirements of 40 CFR Part 63, Subpart ZZZZ upon startup.

c. As required by 40 CFR 63.6610 and 6615, the permittee of the new RICE shall demonstrate compliance with the emission standards specified in Table 1a to Subpart ZZZZ through the following methods:

i. conduct an initial performance test to demonstrate compliance with the formaldehyde concentration or percent reduction emission standards according to the requirements specified in 40 CFR 63.6630 and Tables 4 and 5 to the subpart, initially within 180 days following the compliance date (startup); or

ii. if a performance test has previously been conducted, the test results and the RICE must meet the following requirements to validate compliance:

(a) the performance test must document a concentration of no more than 350 ppbvd formaldehyde at 15% O_2**or**demonstrate a minimum of 76% reduction of formaldehyde across the control device;

(b) the performance test was conducted for the RICE within the last 6 months (or within the last year if meeting the requirements found in the footnote to Table 3 of Subpart ZZZZ), using the same test methods as those required in 40 CFR 63.6620 and specified in Table 4 to the subpart;

(c) there have been no process or equipment changes made to the RICE or control device since the test was performed or it can be demonstrated that such a change would not affect the formaldehyde emissions;

(d) the performance test was conducted at a load condition within plus or minus 10% of 100% load; and

(e) the performance test results are reviewed and approved by the Ohio EPA, Northeast District Office; or

iii. conduct subsequent performance tests every 6 months; or testing can be conducted annually, where demonstrating compliance in 2 consecutive semiannual performance tests meeting the requirements defined in the footnote to Table 3 to the subpart; or

iv. conduct performance tests following a catalyst change.

d. The permittee shall install a continuous parameter monitoring system (CPMS) to measure and collect the inlet temperature of the catalyst to the NSCR. And the pressure drop across the catalyst shall be monitored and recorded monthly.

e. A site-specific monitoring plan shall be prepared for the CPMS that addresses the monitoring system design, data collection, and the quality assurance and control requirements, as identified in 40 CFR 63.6625(b); the plan shall include:

i. The performance criteria and design specifications for the monitoring system, including the sample interface, the detector signal analyzer, and data acquisition and calculations;

ii. the thermocouple location, assuring it will provide representative measurements and an accurate temperature for the inlet of the catalyst control device;

iii. equipment performance evaluation and/or system accuracy audits and procedures;

iv. ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR 63.8(c)(1) and (c)(3); and

v. ongoing reporting and recordkeeping procedures in accordance with the provisions in 40 CFR 63.10(c), (e)(1), and (e)(2)(i).

Following the compliance date of the NESHAP, the permittee shall conduct performance evaluations and/or system accuracy audits for the CPMS in accordance with the site-specific monitoring plan and prior to the compliance demonstration with the NESHAP. The CPMS shall be maintained in continuous operation according to 40 CFR 63.8 and the CPMS must be checked daily to assure it is accurately measuring the catalyst inlet temperature.

f. A performance evaluation of the continuous monitoring system (CMS), i.e., CPMS, shall be conducted in accordance with the site-specific performance evaluation test plan. The site-specific CMS performance evaluation test plan shall demonstrate the precision and accuracy of the equipment and completeness of the data collected. The site-specific performance evaluation test plan shall require all CMS (systems required by rule) to be maintained in continuous operation during process operations and shall include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external quality assurance (QA) program.

i. The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of CMS performance.

ii. The external QA program shall include, at a minimum, provisions for systems audits and validation of instrument calibration, data collection,

sample logging, and documentation of quality control data and field maintenance activities and must also address the following requirements:

(a) each CMS (parameter monitor or sampling probe) shall be installed at a location that accurately measures the exhaust emissions representative of the emissions unit (e.g., on or downstream of the last control device) and accurately measures the process and/or the control device parameters;

(b) performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and

(c) performance evaluation procedures and acceptance criteria, including calibration frequency, results, and records.

The permittee shall submit the site-specific performance evaluation test plan to the Northeast District Office of the Ohio EPA Division of Air Pollution Control (DAPC) at least 60 days before the performance test or performance evaluation is scheduled to begin, or by a mutually agreed upon (by DAPC Central Office) date. The DAPC may request additional relevant information following the review of a site-specific performance evaluation test plan. All CMS shall be installed, operated, and the data verified, as specified in the NESHAP, either prior to or in conjunction with conducting performance tests required under 40 CFR 63.7.

g. In order to maintain ongoing data quality assurance for the CMS, the permittee shall develop and implement a CMS quality control program. As part of the quality control program the permittee shall develop, and submit for approval, a site-specific performance evaluation test plan for the CMS, as required by 40 CFR 63.8(e) and this permit. The quality control program shall also include a written protocol that describes procedures for each of the following operations:

i. initial and any subsequent calibration of the CMS;

ii. determination and adjustment of the calibration drift of the CMS;

iii. preventive maintenance of the CMS, including spare parts inventory;

iv. data recording, calculations, and reporting;

v. accuracy audit procedures, including sampling and analysis methods; and

vi. program of corrective action for a malfunctioning CMS.

The permittee shall keep these written procedures on record for the life of the emissions unit or until it is no longer subject to the NESHAP or other requirement for maintaining the system. The CMS quality control program shall be made available for inspection by the Director or his/her representative upon request. If the performance evaluation plan is revised, it shall be retained as a facility record for a period of 5 years following its revision.

c) Operational Restrictions

(1) The stationary SI RICE shall be installed, operated, and maintained according to the manufacturer's specifications and written instructions/procedures, and in accordance with a maintenance plan that shall provide for operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Thepermittee shall operate and maintain the stationary SI RICE in continuous compliance with the formaldehyde emission standard or control requirement from Table 1a by: establishing operating limitations/parameters during the initial performance test, as required by 40 CFR 63.6630 and as defined in Table 5 to the subpart; by maintaining the operating limitations required per 40 CFR 63.6600(a) and identified in Table 1b to the subpart; and by monitoring and recording these operating parameters as required by 40 CFR 63.6635 and 63.6640 and as defined in Table 6 to the subpart.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart ZZZZ]

(2) The permittee shall minimize the engine's time spent at idle and shall minimize the startup time to a period needed for appropriate safe loading of the engine, not to exceed 30 minutes. The formaldehyde emission standards apply during all periods of operation except for each 30-minute startup of the RICE.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart ZZZZ]

(3) The temperature of the stationary RICE exhaust at the catalyst inlet of the NSCR shall be maintained at greater than or equal to 750 degrees Fahrenheit and less than or equal to 1,250 degrees Fahrenheit; and the pressure drop across the catalyst shall be maintained at no more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test, at 100% load.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart ZZZZ]

(4) The temperature of the stationary RICE exhaust at the inlet of the catalyst shall be maintained at greater than or equal to 750 degrees Fahrenheit and less than or equal to 1,250 degrees Fahrenheit; and the pressure drop across the catalyst shall be maintained at no more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test, at 100% load. The temperature measurement device must meet the following requirements:

a. the temperature sensor shall be located in a position that provides an accurate reading of the exhaust gas temperature at the inlet to the catalyst of the control device;

b. the temperature sensor shall have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit), or 1% of the temperature value, whichever is larger; and

c. an equipment performance evaluation or system accuracy audit shall be conducted for the temperature measurement device on an annual basis.

System accuracy audits could include redundant temperature sensors or a temperature gauge may be inserted in a thermal well co-located with the CPMS sensor. Records of

the results of each inspection, performance evaluation, and/or accuracy audit for the CPMS shall be maintained for a period of 5 years.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart ZZZZ]

(5) The CPMS shall be installed, operated, and the data verified either prior to or in conjunction with conducting performance tests as required per 40 CFR 63.7, 63.8, 40 CFR 63.6625, and the site-specific monitoring plan. The permittee shall maintain and operate each CMS as specified in this permit and as follows:

a. The permittee shall maintain and operate the CPMS in a manner consistent with safety and good air pollution control practices for minimizing emissions, as specified in 40 CFR 63.6(e)(1) and as reflected in the operations and maintenance requirements of this permit.

b. The permittee shall keep the necessary parts for routine repairs and maintenance of the CPMS equipment readily available.

c. The CPMS shall be installed at a location that accurately measures the temperature at the inlet to the catalyst and according to the procedures documented in 40 CFR 63.6625(b) and the temperature data shall be reduced to 4-hour rolling averages.

d. Verification of the operational status of each CMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system.

e. The read out, (the visual display or measured record of the CMS) or other indication of operation, from any CMS required for compliance with the emission standard, shall be readily accessible and visible for monitoring and recording by the operator of the equipment; and

f. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all CMS shall be maintained in continuous operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart ZZZZ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate, and maintain the CPMS to measure and collect the catalyst inlet temperature according to the requirements of 40 CFR 63.8, 40 CFR 63.6625(b), and the site-specific monitoring plan. The permittee shall continuously monitor the catalyst inlet temperature at all times the unit is in operation and reduce the data to 4-hour rolling averages. The CPMS shall collect data at least every 15-minutes.

For purposes of calculating data averages, data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used in calculating the rolling 4-hour average catalyst inlet temperature. The data collected during all other periods of operation shall be used in assessing compliance.

The engine is in compliance when the rolling 4-hour average temperature of the stationary RICE exhaust at the inlet of the catalyst is greater than or equal to 750 degrees Fahrenheit and less than or equal to 1,250 degrees Fahrenheit. Each record must be maintained for a period of 5 years.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(2) Except during malfunctions, repairs, and required quality assurance and/or control activities, and following the compliance date of the NESHAP, the permittee shall continuously monitor that the stationary RICE is operating; and all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) shall be used in calculations used to report emissions or operating levels.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(3) The permittee shall collect and maintain the following records for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, as required by 40 CFR 63.6655:

a. a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ;

b. records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment, where applicable;

c. records of performance tests and performance evaluations of any continuous monitoring equipment used to demonstrate compliance, as required per 40 CFR 63.10(b)(2)(viii);

d. records of all required maintenance performed on the air pollution control and monitoring equipment, where applicable;

e. records of actions taken during periods of malfunction to minimize emissions in accordance with 63.6605(b), including corrective actions to restore the malfunctioning process and/or control equipment to normal operations;

f. records of performance tests conducted to demonstrate compliance;

g. a record of each idle and/or startup time that exceeded 30 minutes;

h. the records required in Table 6 to 40 CFR Part 60, Subpart ZZZZ; and

i. for each CPMS (or any CEMS):

i. the records identified in 40 CFR 63.10(b)2(vi) through (xi);

ii. previous (superseded) versions of the performance evaluation plan, required per 40 CFR 63.8(d)(3); and

iii. records of the request and approval of alternatives to the relative accuracy test for CEMS or CPMS as required per 40 CFR 63.8(f)(6), if applicable.

The records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(4) The permittee shall maintain the following records for the CMS (CPMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

The records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(5) The permittee shall record the pressure drop across the NSCR at least once per month and the NSCR control device shall be maintained so that the pressure drop across the catalyst does not change by more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test operating at 100% load. The requirement to monitor and maintain the pressure drop according to these requirements shall be included in the site-specific monitoring plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

e) Reporting Requirements

(1) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6600(a), shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(2) The permittee shall submit an initial notification to the Ohio EPA Division of Air Pollution Control Northeast District Office, in writing, indicating that the RICE is subject to the Subpart ZZZZ NESHAP standards in 40 CFR Part 63. If not already submitted, the initial notification report shall be submitted no later than 120 calendar days following initial startup and it shall provide the following information:

a. the facility name, address, facility ID number, and emission unit number(s) identified in the report;

b. the address (i.e., physical location) of the emissions unit;

c. an identification of the relevant standard (Part 63, Subpart ZZZZ), the applicable limitation(s) or other requirement(s) that is/are the basis of the notification, and the emission unit's compliance date;

d. a brief description of the nature, size, design, and method of operation of the RICE, and an identification of the emission unit(s) subject to the NESHAP and types of hazardous air pollutants emitted; and

e. a statement of whether the emissions unit is a major source or an area source.

The permit application may satisfy the initial notification requirement.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(3) The permittee shall submit semiannual compliance reports that identify any exceedance of the formaldehyde emission limitation, formaldehyde reduction requirement, and/or deviation from the operating limitations on the temperature and pressure drop of the NSCR control. The semiannual compliance report shall contain the following information:

a. the facility name, address, facility ID number, and emission unit number(s) identified in the report;

b. a statement by a responsible official certifying the accuracy of the content of the report;

c. the date of report and beginning and ending dates of the reporting period;

d. a brief description of the stationary RICE, at a minimum, the horsepower, year of manufacturer, and use;

e. each instance in which the general provisions identified in Table 8 of Part 63, Subpart ZZZZ were not met;

f. the number, duration, cause, and description of each exceedance, deviation, and/or malfunction which caused or may have caused an exceedance of the emission limitation or a deviation from the operating limitations for the temperature and pressure drop monitored for the control device;

g. the corrective actions taken during each/any deviation or exceedance to minimize emissions and to correct the malfunction;

h. the total operating time of the stationary RICE if an exceedance or deviation occurred during the reporting period that did not involve a continuous monitoring system (CMS);

i. if there is/are no exceedance(s) or deviation(s) from the emission limitations or operating limitations during the reporting period, a statement to that effect;

j. if there were <u>no</u> periods of time during which the CMS was out-of-control during the reporting period, a statement to that effect;

k. for each exceedance of the emission limitation or percent reduction for formaldehyde or for each deviation from the operating limitation for the catalyst inlet temperature of the NSCR recorded by the CPMS, the following information:

   i. identification of the CMS, i.e., the type, model, and manufacturer, and the exact location of the probe;

   ii. the date and time that each malfunction started and stopped;

   iii. the date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks;

   iv. the date, time, and duration that each CMS was out-of-control (including the information in 40 CFR 63.8(c);

   v. the date and time each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;

vi. a summary of the total duration of the deviation during the reporting period, and the total duration of the deviation as a percent of the engine's total operating time during the reporting period;

vii. a breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, and other know or unknown causes;

viii. a summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent to the total operating time of the stationary engine during the reporting period;

ix. the date of the latest certification or audit of the temperature CMS; and

x. description of any changes to the engine, CMS, processes, or controls since the last reporting period.

The semiannual compliance reports shall cover the reporting periods from January 1 through June 30 and July 1 through December 31 of each year and shall be postmarked or delivered no later than July 31 or January 31 following each reporting period.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

(4) The permittee shall collect and submit required CMS performance evaluation results to the Director (Ohio EPA Division of Air Pollution Control Northeast District Office) as follows:

a. A written report of the results of each CMS performance evaluation shall be submitted simultaneously with the results of the performance test within 30 days of completion of the performance evaluation and compliance demonstration. The written report shall include the raw data from the performance evaluation with the report of the results.

b. Monitoring data recorded during periods of unavoidable CMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level adjustments shall not be included in any data average reported.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

f) Testing Requirements

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

a. <u>Opacity Limitation</u>:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19131]

b. Opacity Limitation:

Visible emissions of fugitive dust from thebuilding shall notexceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19131]

c. Emission Limitations:

PE from the stack shall not exceed 0.310 lb/million Btu of actual heat input.

Applicable Compliance Method:

The emission limit was set equal to the particulate emissions limit in OAC rule 3745-17-11(B)(5)(a). Compliance is demonstrated by showing that the U.S. EPA AP-42 emissions factor for particulate emissions for a rich burn engine has lower particulate emissions than the established emission limit. Assuming PM equals to PM10, the emissions factor is 0.0095 pounds PM10/million Btu, (AP-42, Chapter 3.2, July ’00, Natural Gas-fired Reciprocating Engines (4-Stroke Rich-Burn Engines), Table 3.2-3);

If required, compliance with the allowable particulate emissions limit shall be determined in accordance with the following method(s): Methods 1-4, and Method 5 of 40 CFR part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19131]

d. Emission Limitations:

NO_x emissions from the stack shall not exceed 0.098 lb/hr and 0.43 ton/yr.

CO emissions from the stack shall not exceed 1.00 lb/hr and 4.38 tons/yr.

SO_2 emissions from the stack shall not exceed 0.0026 lb/hr and 0.011 ton/yr.

OC emissions from the stack shall not exceed 0.13 lb/hr and 0.57 ton/yr.

PE from the stack shall not exceed 6.00 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated by applying the emission factors from AP-42, Chapter 3.2, July, '00, Natural Gas-fired Reciprocating Engines (4-Stroke Rich-Burn Engines), found in Table 3.2-3 as follows:

E = EF x 4.417 mmBtu/hr

where:

E = emission rate (pounds per hour);

EF = emission factors from AP-42, Chapter 3.2, July, '00, Natural Gas-fired Reciprocating Engines (4-Stroke rich-Burn Engines), found in Table 3.2-3:

For NOx: 2.21 ln/mmBtu;
For CO: 3.72 lb/mmBtu;
For SO2: 0.000588 lb/mmBtu;
For OC: 0.0296 lb/mmBtu; and

4.417 mmBtu/hr = Fuel Input (million BTU/hr).

The annual limits, for all but particulate emissions, compliance shall be determined by multiplying the hourly emission limits for each pollutant by the maximum hours of operation per year of 8760, and then dividing by 2000 (pounds per ton). For particulate emissions, compliance shall be determined by multiplying together the emissions limit (0.310 pound of particulate emissions per million Btu of actual heat input), the maximum fuel input (4.417 mmBtu.hr) and the maximum hours of operation per year 8760, and then dividing the product by 2000 (pounds per ton).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19131]

e. Emission Limitations:

Emissions of formaldehyde shall not exceed 350 ppbvd at 15% O_2 or shall be reduced by 76% or more. See b)(1)b.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19131]

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration; and

The emission testing shall be conducted within 3 months following a catalyst change.

The appropriate tests methods from Table 4 to Subpart ZZZZ shall be conducted based on the option chosen for compliance, i.e., the part per million concentration or percent reduction. The appropriate emission and/or operating limitations, required per 40 CFR 63.6630 and identified in Table 5, shall be established and/or compliance demonstrated during each performance test.

The permittee shall conduct subsequent performance tests every 6 months (semiannually) with the following exceptions:

i. where following 2 consecutive compliant performance tests, the frequency can be reduced to annually if each such test demonstrates compliance with the formaldehyde emission limitation and where there have been no deviations from operating limitations; or

ii. unless the Ohio EPA determines future testing to be necessary, if choosing to comply with the 76% control limitation for formaldehyde, only the initial performance test is required for 4SRB RICE smaller than 5,000 bHP located at a major source for HAP, and where continuous compliance is demonstrated using the CPMS in accordance with 40 CFR 63.6625(b) and by documenting the 4-hour rolling average of the catalyst inlet temperature.

The temperature at the inlet to the catalyst of the NSCR shall be monitored during the performance test and maintained between 750 °F and 1,250 °F. The CPMS, installed to measure the temperature at the inlet to the NSCR catalyst, shall complete one cycle of operation for each successive 15-minute period of operations, with a minimum of 4 successive cycles or operation for each valid hour of testing, and in accordance with 40 CFR 63.6625(b). The 3-hour block average temperature at the inlet to the catalyst shall be documented during performance tests and the pressure drop shall be recorded to establish the operating range for the pressure drop across the catalyst. Per 63.6640(b), if the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation and to reestablish the values for, or compliance with, the operating parameters.

Each performance test shall consist of 3 separate test runs and each test run shall last a minimum of 1 hour and shall be conducted during normal operations. The engine percent load, during the performance test, shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load; and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the formaldehyde emissions have been reduced by 76% or that the average

formaldehydeconcentration is less than or equal to 350 ppbvd, corrected to 15 percent O_2on a dry basis, and from three 1-hour or longer performance test runs.

The following test methods shall be employed to demonstrate compliance withthe emission limitation or control requirement for formaldehyde:

iii. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points

iv. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O_2 at the inlet and/or outlet of the control device to normalize the formaldehyde concentration(s).

v. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.

vi. Method 25A of 40 CFR Part 60, Appendix A, reported as propane, to measure THC at the inlet and outlet of the control device, if demonstrating compliance with the formaldehyde standard through the percent control of THC.

vii. Method 320 or Method 323 of 40 CFR Part 63,, Appendix A; or ASTM D 6348-03 to measure formaldehyde at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure formaldehyde at the exhaust of the stationary RICE.

viii. The following equation shall be used to normalize the formaldehyde or THC concentrations to a dry basis and to 15 percent oxygen (O_2)**:

$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$

where:

C_{adj}= calculated formaldehyde or THC concentration adjusted to 15 percent O_2;

C_d= measured concentration of formaldehyde or THC, uncorrected;

5.9 = 20.9 percent O_2 − 15 percent O_2, the defined O_2 correction value, percent; and

$\%O_2$ = measured O_2concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O_2 using a CO_2correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

ix. If compliance is demonstrated for the control efficiency for formaldehyde or THC, the following equation shall be used to determine the percent reduction:

$R = (C_i - C_o) / C_i \times 100$

where:

C_i= concentration of formaldehydeor THC at the control device inlet;

C_o= concentration of formaldehydeor THC at the control device outlet; and

R = percent reduction of formaldehydeor THC emissions.

The permittee shall notify the Director (Ohio EPA Division of Air Pollution Control Northeast District Office) in writing of each scheduled performance test date at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

Personnel from the Ohio EPA, Northeast District Office 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ]

g) Miscellaneous Requirements

(1) None.

6. P019, Cold Cleaning Operations

Operations, Property and/or Equipment Description:

Facility-wide cleanup for fiberglass reinforced plastic operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (PTI P0116250)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart WWWW. See b)(2)c.
b.	OAC rule 3745-31-05(A)(3) as effective 12/01/06	See b)(2)d.
c.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(2).
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
e.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. The following operations and materials are specifically excluded from any requirements in this rule:

i. application of mold sealing and release agents; and

ii. mold stripping and cleaning.

b. "Cleaning" means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)a and b)(2)c.

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

c) Operational Restrictions

(1) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart WWWW and P0116250]

(2) Do not use cleaning solvents (cleaners) that have VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25 and P0116250]

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and P0116250]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and P0116250]

(3) The permittee shall maintain the following monthly records for each emissions unit:

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

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

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

d. the OC content of each cleanup material, in pounds per gallon;

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

f. the total OC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “d” times “e” for all cleanup materials employed;

g. If a credit for recovered cleanup materials is to be used to demonstrate compliance, records of the total amount (lbs) of cleanup material collected and added to the recovery container, for recycle, recovery, and/or disposal at an outside facility, shall be maintained in the following manner:

i. the date the materials from the recovery container were shipped off site; and

ii. the number of gallons or pounds of materials from the recovery container shipped off site; and

h. A credit of recovered cleanup materials may be used to adjust the amount of OC emissions in section d)(3)f.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116250]

e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., cleaning solvents used did not contain HAP, except that styrene was used as a cleaner in closed systems, and organic HAP containing cleaners was used to clean cured resin from application equipment, for the reporting period); and

b. if there are no deviations from the work practice standard in c)(2), provide a statement that there were no deviations from the work practice standard during the reporting period (i.e., each cleaning solvent used did not have a VOC content greater than 0.42 pound VOC per gallon (except cleaners used in closed systems and used to clean cured resin from application equipment) for the reporting period);

c. if there were deviations with any of the work practice standard in c)(1) – c)(2), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTI P0116250]

(2) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0116250]

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) None.

7. P020, Politen Mixer #2

Operations, Property and/or Equipment Description:

Resin mixing for fiberglass reinforced plastic operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0115606)	Organic compound (OC) emissions shall not exceed 1,216 lbs/month and 7.3 tons/year. Particulate emissions (PE) shall not exceed 0.022lb/hr and 0.1 ton/year. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.
b.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 63.5935)	Work practice standards in Table 4 of Subpart WWWW. See c)(1)a,c)(1)b and c)(1)c.
c.	40 CFR Part 63.1 – 63.15 (40 CFR 63.5925)	Table 15 to Subpart WWWW – Applicability of General Provisions, Subpart A.
d.	OAC rule 3745-17-07(A)	The emission limitationrequired by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitationrequired by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-25(D)	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1)a, c)(1)b and c)(1)c.

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate control, fabric filter system whenever thisemissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall meet the following work practice standards:

a. use mixer covers with no visible gaps present in the mixer covers, except thatgaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;

b. close any mixer vents when actual mixing is occurring, except that venting isallowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and

c. keep the mixer covers closed while actual mixing is occurring except whenadding materials or changing covers to the mixing vessels.

[Authority for term: OAC rule 3745-77-07(A)(1),OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW and P0115606]

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and P0115606]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and P0115606]

(3) The permittee shall maintain the following monthly records for each emissions unit:

a. the company identification for each resin paste;

b. pounds of each resin paste mixed;

c. the weight percent of available VOC monomer (e.g., styrene, methyl methacrylate) for each resin paste mixed; and

d. the total VOC emission rate for all resin paste mixed, as calculated by the following equation, in pounds per month:

$$\text{VOC}\left(\frac{\text{lbs}}{\text{month}}\right) = \sum_{i}^{n}[(W)(P)]i \text{ x EF}$$

where:

W = the weight of each resin applied, as recorded in d)(3)b;
P = the percent of available VOC monomer, by weight, of each resin paste, as recorded in d)(3)c;
i = pounds of available VOC monomer in each resin paste, i, mixed;
n = number of resin paste mixed; and
EF = each emission factor.

EF = emission factor of 0.25%. The emission factor of 0.25% of available HAP (VOC monomer) is taken from Table 5-2, "Average HAP emission Equations by Process" in US EPA's document "Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites Backgrounds Information Document for Proposed Standards"

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115606]

(4) The permittee shall perform daily inspections of the mixer when resin is present in the mixing vessel, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times the mixer cover was not closed over the mixing vessel, when actual mixing is occurring, except when adding materials or changing covers to the mixing vessel;

c. the date and all times the mixer vents were not closed over the mixing vessel, when actual mixing is occurring, except that venting is allowed during additions of materials, or as necessary prior to adding materials or opening the cover for safety;

d. the date and all times when visible gaps were present in the mixer cover, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation when the mixer cover was properly employed; and

e. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall record the date and all times the fabric filter was not in service to control PE when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115606]

e) Reporting Requirements

(1) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standards in c)(1)a – c)(1)c, provide a statement that there were no deviations from each of the those work practice standards during the reporting period (i.e., (1) used mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch were permissible around mixer shafts and any required instrumentation; (2) closed any mixer vents when actual mixing was occurring, except that venting was allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety; and (3) kept the mixer covers closed while actual mixing was occurring except when adding materials or changing covers to the mixing vessels.); and

b. if there were any deviations with the work practice standards in c)(1)a, c)(1)b or c)(1)c, provide the total operating time of the emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services)by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1),OAC rule 3745-21-25(D), 40 CFR Part 63, Subpart WWWW and PTI P0115606]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the 1,216 pounds per month limit, and the actual VOC emissions for each such month.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115606]

(3) The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northeast District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0115606]

(4) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 1,216 lbs/month and 7.3 tons/year.

Applicable Compliance Method:

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

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,216 lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)and PTI P0115606]

b. Emission Limitation:

PE shall not exceed 0.022lb/hr and 0.1 ton/year.

Applicable Compliance Method:

If required, compliance with the allowable particulate emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.022lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)and PTI P0115606]

c. Opacity Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115606]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -Closed Molding: P013, P014 and P015

EU ID	Operations, Property and/or Equipment Description
P013	Compression Mold Press A - Liquid Composite Molding
P014	Compression Mold Press B - Liquid Composite Molding
P015	Compression Mold Press C - Liquid Composite Molding

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTIs: P0115470, P0115471)	Volatile organic compound (VOC) emissions shall not exceed 1,216lbs/month and 7.3tons/yr.
b.	OAC rule 3745-21-25	Work practice standards in Table 1 of OAC rule 3745-21-25. See c)(1).
c.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-5935)	Work practice standard in Table 4 of Subpart WWWW. See c)(1).
d.	40 CFR Part 63.1 through 63.15	The General Provisions that apply are specified in Table 15 of 40 CFR Part 63, Subpart WWWW.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0115470 and P0115471]

d) Monitoring and/or Recordkeeping Requirements

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

63.5915(a)	copy of compliance notification(s) and report(s)
63.5915(d)	certified statement of compliance with work practice requirements
63.5920(a) – (d)	record keeping format and retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart WWWW and PTIs P0115470 and P0115471]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements under OAC rule 3745-21-25, including the following sections:

OAC rule 3745-21-25(P)(1)(a)	a copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status
OAC rule 3745-21-25(P)(1)(e)	a certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.
OAC rule 3745-21-25(P)(4)	record keeping retention requirements

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25 and PTIs P0115470 and P0115471]

(3) The permittee shall maintain the following monthly records for each emissions unit:

a. the identification of each liquid molding compound (LMC)paste applied;

b. the weight of each LMCpaste (resin paste) applied;

c. the percent of VOC monomer(s), by weight, of each LMC applied; and

d. the total VOC emission rate for all LMCpaste used, as calculated by the following equation, in pounds per month:

$$\mathrm{VOC}\left(\frac{\mathrm{lbs}}{\mathrm{month}}\right) = \sum_{\mathrm{i}}^{\mathrm{n}}[(\mathrm{EF}_1)(\mathrm{W}) + (\mathrm{EF}_2)(\mathrm{W})]\mathrm{i}$$

where:

W = the weight of each LMC pasteapplied, as recorded in d)(3)b;

i = a specific LMCpaste applied during the month;

n = total number of LMCpaste applied during the month; and

EF = emissions factors:

EF_1 = LCM poured paste factor (% of paste weight) = 0.0022 x % VOC monomer + 0.0008

EF_2 = LCM spread paste factor (% of paste weight) = 0.0072 x % VOC monomer + 0.0008

Note: The "% VOC monomer" input value in these equations must be in decimal form instead of percentage (0.20 instead of 20%). These equations generate the factor as a decimal fraction of the processed paste weight. VOC monomer includes all available VOC monomers in each LMCpaste (e.g., styrene, vinyl toluene, methyl methacrylate, and etc.).

[ANSI/ACMA/ICPA UEF-1-2011a, Estimating Emission Factors from Open Molding and Other Composite Processes]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0115470 and P0115471]

(4) The permittee shall inspect each molding machine when in operation, and record the following information:

a. the date and reason why any required inspection was not performed;

b. the date and all times when two or more charges were uncovered, unwrapped or exposed per mold cycle per compression molding machine; and

c. information on the duration and cause of each deviation and the corrective action taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0115470 and P0115471]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each month when the VOC emissions exceeded the 1,216 pounds per month limit, and the actual VOC emissions for each such month.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0115470 and P0115471]

(2) The permittee must submit semiannual compliance reports:

a. if there are no deviations from the work practice standard in c)(1), provide a statement that there were no deviations from this work practice standard during the reporting period (i.e., the facility had uncovered, unwrapped or exposed only one charge per mold cycle per compression molding machine);

b. if there were deviations with any of the work practice standard in c)(1), provide the total operating time of each emissions unit during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. These compliance reports shall be submitted to the Director (the Ohio EPA eBusiness Center, Air Services) by July 31 or January 31, respectively.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-25, 40 CFR Part 63, Subpart WWWW and PTIs P0115470 and P0115471]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

VOC emissions shall not exceed 1,216lbs/month and 7.3tons/yr.

<u>Applicable Compliance Method</u>:

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

The annual emission limitation was developed by multiplying the monthly VOC emission limitation (1,216lbs/month) by 12 months per year, and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the monthly allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs: P0115470, P0115471]

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -Treaters 1 & 2: K001 and K002

EU ID	Operations, Property and/or Equipment Description
K001	Treater # 2
K002	Treater # 1

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(B)(6) (fabric and paper coating, using capture and control system), in lieu of complying with VOC limitations in OAC rule 3745-21-09(F) and OAC rule 3745-21-09(G)	The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.
b.	OAC rule 3745-21-09(F)(2)(a)(i) For paper coating	The control system shall reduce VOC emissions from the paper coating line by at least 90 percent.
c.	OAC rule 3745-21-09(F)(2)(b) For paper coating	See c)(2).
d.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3320) [Always-controlled work station]	Organic hazardous air pollutants (HAP) shall not exceed emissions standards as specified in40 CFR 63.3320, Subpart JJJJ. i. No more than 5 percent of the organic HAP applied for each month (95% reduction) at existing affected sources; or ii. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		iii. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources; or iv. Operate the thermal oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent. See b)(2)a.
e.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280-3420), Table 1	Operating limits, using add-on control devices and capture system. See b)(2)c, b)(2)d, b)(2)e and c)(3).
f.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280-3420), Table 2	Applicability of General Provisions, Subpart A, 40 CFR Part 63.1-15.
g.	40 CFR 64, Compliance Assurance Monitoring	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emission limitations in OAC rule 3745-21-09(B)(6) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.

(2) Additional Terms and Conditions

a. The permittee must demonstrate compliance by following the procedures in 40 CFR 63.3370.

b. All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device.

d. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “ii”, shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

e. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

c) Operational Restrictions

(1) The thermal oxidizer shall be operated at all times when the emissions unit is in operation.

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

(2) Work practice standards for cleaning materials.

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety percent, any person using an organic solvent for cleanup shall:

a. store all VOC containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)(b)]

(3) The permittee shall comply with all applicable operational limits of 40 CFR Part 63, Subpart JJJJ, including the following sections:

§ 63.3321(a) and Table 1 of 40 CFR 63, Subpart JJJJ	The thermal oxidizer's average temperature in any 3-hour period must not fall below the combustion temperature operating limit established during the most recent performance test that demonstrated compliance. [During the July 17, 2008, performance test, the combustion temperature operating limit was established at 1400°F.]
§ 63.3321(a) and Table 1 of 40 CFR 63, Subpart JJJJ	The permittee must meet the operating limit(s) that have been established in the monitoring plan developed by the facility for the emission capture system(s).
§ 63.3321(a)	The permittee shall meet the operating limits at all times after establishing them.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63, Subpart JJJJ]

(4) The permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 51, Appendix M, Method 204]

(5) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 51, Appendix M, Method 204]

d) Monitoring and/or Recordkeeping Requirements

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

§ 63.3350 If I use a control device to comply with the emission standards, what monitoring must I do?	
§ 63.3350(e)	Continuous parameter monitoring system (CPMS). If you are using a control device to comply with the emission standards in § 63.3320, you must install, operate, and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of this section according to the requirements in paragraphs (e)(1) through (8) of this section.
§ 63.3350(e)(1)	Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
§ 63.3350(e)(2)	You must have valid data from at least 90 percent of the hours during which the process operated.
§ 63.3350(e)(3)	You must determine the hourly average of all recorded readings according to paragraphs (e)(3)(i) and (ii) of this section. (e)(3)(i) To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control. (e)(3)(ii) Provided all of the readings recorded in accordance with paragraph (e)(3) of this section clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
§ 63.3350(e)(4)	To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
§ 63.3350(e)(5)	You must record the results of each inspection, calibration, and

	validation check of the CPMS.
§ 63.3350(e)(6)	At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
§ 63.3350(e)(7)	Data recorded during monitoring malfunctions, associated repairs, out-of control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
§ 63.3350(e)(8)	Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation.
§ 63.3350(e)(9)	Oxidizer. If you are using an oxidizer to comply with the emission standards, you must comply with paragraphs (e)(9)(i) through (iii) of this section.
§ 63.3350(e)(9)(i)	Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.
§ 63.3350(e)(9)(ii)	For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1° Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
§ 63.3350(e)(10)	Other types of control devices. Ifyou use a control device other than anoxidizer or wish to monitor analternative parameter and comply witha different operating limit, you mustapply to the Administrator for approvalof an alternative monitoring methodunder § 63.8(f).
§ 63.3350(f)	Capture system monitoring.

	If you are complying with the emission standards in § 63.3320 through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in paragraphs (f)(1) and (2) of this section for these capture systems. You must monitor the capture system in accordance with paragraph (f)(3) of this section. You must make the monitoring plan available for inspection by the permitting authority upon request.
§ 63.3350(f)(1)	The monitoring plan must: (i) Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and (ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and (iii) Identify the specific monitoring procedures.
§ 63.3350(f)(2)	The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in § 63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
§ 63.3350(f)(3)	You must conduct all capture system monitoring in accordance with the plan.
§ 63.3350(f)(4)	Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
§ 63.3350(f)(5)	You must review and update the capture system monitoring plan at least annually.

§ 63.3370 How do I demonstrate compliance with the emission standards?		
If you choose to demonstrate compliance by:	Then you must demonstrate that:	To accomplish this:
(a)(1) Use of ‘‘as-purchased’’ compliant	(i) Each coating material used at an existing affected source does not exceed 0.04 lb organic HAP per	Follow the procedures set out in § 63.3370(b).

coating materials.	lbcoating material as-purchased; or (ii) Each coating material used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-purchased.	Follow the procedures set out in § 63.3370(b).
(a)(2) Use of ‘‘as-applied’’ compliant coating materials.	(i) Each coating material used at an existing affected source does not exceed 0.04 lb organic HAP per lb coating material as-applied; or (ii) Each coating material used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-applied; or (iii) Monthly average of all coating materials used at an existing affected source does not exceed 0.04 lb organic HAP per lb coating material as-applied on a monthly average basis; or (iv) Monthly average of all coating materials used at an existing affected source does not exceed 0.2 lb organic HAP per lb coating solids as-applied on a monthly average basis.	Follow the procedures set out in § 63.3370(c)(1). Use either Equation 1a or b of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(i). Follow the procedures set out in § 63.3370(c)(2). Use Equations 2 and 3 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(i). Follow the procedures set out in § 63.3370(c)(3). Use Equation 4 of § 63.3370 to determine compliance with § 63.3320(b)(2) in accordance with § 63.3370(c)(5)(ii). Follow the procedures set out in § 63.3370(c)(4). Use Equation 5 of § 63.3370 to determine compliance with § 63.3320(b)(3) in accordance with § 63.3370(c)(5)(ii).
(a)(3) Tracking total monthly organic HAP applied	Total monthly organic HAP applied does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(d).Show that total monthly HAP applied (Equation 6 of § 63.3370) is less than the calculated equivalent allowable organic HAP (Equation 13a or b of § 63.3370).
(a)(4) Use of a capture system and control device	(i) Overall organic HAP control efficiency is equal to 95 percent at an existing affected source on a monthly basis; or oxidizer outlet organic HAP concentration is no greater than 20 ppmv by compound and capture efficiency is 100	Follow the procedures set out in § 63.3370(e) to determine compliance with § 63.3320(b)(1) according to § 63.3370(j) if using a control device and CPMS, or § 63.3370(k) if using an oxidizer.

	percent; or operating parameters are continuously monitored; or	
	(ii) Overall organic HAP emission rate does not exceed 0.2 lb organic HAP per lb coating solids for an existing affected source on a monthly average as-applied basis;	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(k) if using an oxidizer.
	(iii) Overall organic HAP emission rate does not exceed 0.04 lb organic HAP per lb coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(k) if using an oxidizer.
	(iv) Overall organic HAP emission rate does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370). Calculate the monthly organic HAP emission rate according to § 63.3370(k) if using an oxidizer.
(a)(5) Use of multiple capture and/or control devices.	(i) Overall organic HAP control efficiency is equal to 95 percent at an existing affected source and 98 percent at a new affected source on a monthly basis; or	Follow the procedures set out in § 63.3370(e) to determine compliance with § 63.3320(b)(1) according to § 63.3370(e)(1) or (2).
	(ii) Average equivalent organic HAP emission rate does not exceed 0.2 kg organic HAP per kg coating solids for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(n).
	(iii) Average equivalent organic HAP emission rate does not exceed 0.04 kg organic HAP per kg coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(n).
	(iv) Average equivalent organic HAP emission rate does not exceed the calculated limit based	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission

	on emission limitations.	rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370) according to § 63.3370(n).
(a)(6) Use of a combination of compliant coatingsand control devices.	(i) Average equivalent organic HAP emission rate does not exceed 0.2 lb organic HAP per lb coating solids for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(f) to determine compliance with § 63.3320(b)(3) according to § 63.3370(n).
	(ii) Average equivalent organic HAP emission rate does not exceed 0.04 lb organic HAP per lb coating material for an existing affected source on a monthly average as-applied basis; or	Follow the procedures set out in § 63.3370(g) to determine compliance with § 63.3320(b)(2) according to § 63.3370(n).
	(iii) Average equivalent organic HAP emission rate does not exceed the calculated limit based on emission limitations.	Follow the procedures set out in § 63.3370(h). Show that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 13a or b of § 63.3370) according to § 63.3370(n).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) In order to maintain compliance with the applicable emission limitation contained in b)(1)a, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[During the July 17, 2008, performance test, the average combustion temperature of the thermal oxidizer was measured at 1400°F. Therefore, acceptable average combustion temperature within the thermal oxidizer shall not fall below 1350°F for any 3-hour block of time when the emissions unit is operating.]

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09]

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated,

operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degress Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

(4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the limit established in d)(2), 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 operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date 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 temperature 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.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 51, Appendix M, Method 204]

(6) The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 51, Appendix M, Method 204]

(7) The permittee shall perform monthly checks of the storage areas for all VOC-containing cleaning materials and used shop towels and cleaning storage, mixing, and conveying equipment to ensure continuing compliance with the work practice standards applicable to organic solvent cleaning materials used outside the permanent enclosure. Records shall be kept of each monthly check, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(l)]

(2) The permittee shall identify the following information in the quarterly deviation report:

a. all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure;

b. all periods of time during which an access door and/or window, not qualifying as a natural draft opening, was left open during operations; and

c. all weekly average facial velocity readings at natural draft openings that were less than 200 feet per minute.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and such other notifications and reports to the Director (the Ohio EPA eBusiness Center, Air Services) as are required in 40 CFR Part 63, Subpart JJJJ, pursuant to the following sections:

§63.3400 What notifications and reports must I submit?	
§63.3400(c)	You must submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section.
§63.3400(c)(1)	semi-annual compliance reports
§63.3400(c)(2)	The compliance report must contain the information in paragraphs (c)(2)(i) through (vi) of this section: (i) Company name and address. (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report. (iii) Date of report and beginning and ending dates of the reporting period. (iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted. (v) For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(2)(i) through (iii) of this section, and: (A) The total operating time of each affected source during the reporting period. (B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken. (C) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.
§63.3400(g)	You must submit startup, shutdown, and malfunction reports as specified in § 63.10(d)(5), except that the provisions in subpart A of this part pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

§63.3400(g)(1)	If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by § 63.6(e)(3), the owner or operator must state such information in the report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(4) The permittee shall submit quarterly deviation (excursion) that identify any observeddeviations from the required organic solvent cleaning materials work practices, thecause(s) and the corrective actions taken.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitations:

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the emission testing procedures specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

Organic HAP shall not exceed emissions standards as specified in40 CFR 63.3320, Subpart JJJJ.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

§ 63.3360	What performance tests must I conduct?

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

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

a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

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

   i. capture efficiency of PTE(s): 40 CFR Part 60, Appendix A, Method 204;

   ii. control efficiency of thermal oxidizer: 40 CFR Part 60, Appendix A, Method 25, or 25A; and

   iii. 40 CFR Part 60, Appendix A, Methods 1 through 4.

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

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

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.