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

4/23/2014

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

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Norplas Industries Inc.
Facility ID: 0387000362
Permit Type: Renewal
Permit Number: P0087896

Dear Ms. Damico:

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

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Norplas Industries Inc.

Facility ID:	0387000362
Permit Number:	P0087896
Permit Type:	Renewal
Issued:	4/23/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Norplas Industries Inc.

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 11
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. P001, Misc. Cleanup Operations 24
2. P002, Paint Kitchen 31
3. P117, Mold Presses 37
4. R001, Paint Line 43

Authorization

Facility ID:	0387000362
Facility Description:	Injection molding and painting of automotive plastic components
Application Number(s):	A0018981, A0018982, A0046800, A0048304, A0049938
Permit Number:	P0087896
Permit Description:	Title V permit renewal for injection molding and painting of automotive plastic components.
Permit Type:	Renewal
Issue Date:	4/23/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087895

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

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

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

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

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

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

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

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following non-insignificant emissions units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products): P001, P002, and R001. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP and 40 CFR Part 63, Subpart MMMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP and Table 2 of 40 CFR Part 63, Subpart MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subparts PPPP and MMMM, and in Subpart A.

   All the requirements of 40 CFR Part 63, Subpart PPPP and 40 CFR Part 63, Subpart MMMM, have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart PPPP and 40 CFR Part 63, Subpart MMMM, have been cited in the appropriate sections for the non-insignificant emissions units (P001 and R001) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   [Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart MMMM and Subpart PPPP]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in: a permit-to-install; or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21; or in 40 CFR Part 60, Subpart IIII; or in 40 CFR Part 63, Subparts DDDDD, PPPP and/or MMMM, and ZZZZ.

   a) B001 – 8 mmBtu/hr natural gas-fired hot water heater (PTI #P0105907);
   b) B005 – <9.9 mmBtu/hr natural gas-fired heater;
   c) B007 – 6.55 mmBtu/hr natural gas-fired air make-up unit (amu);
   d) B008 – 6.23 mmBtu/hr natural gas-fired amu;
   e) B009 – 6.55 mmBtu/hr natural gas-fired amu;
   f) B010 – 4.03 mmBtu/hr natural gas-fired amu;
   g) B011 – 4.53 mmBtu/hr natural gas-fired amu;
   h) B015 – <9.9 mmBtu/hr natural gas-fired amu;
   i) B023 – <9.9 mmBtu/hr natural gas-fired amu;
   j) B024 – <9.9 mmBtu/hr natural gas-fired amu;
   k) B025 – <9.9 mmBtu/hr natural gas-fired amu;
   l) B026 – <9.9 mmBtu/hr natural gas-fired amu;
   m) B027 – <9.9 mmBtu/hr natural gas-fired amu;
   n) B028 – <9.9 mmBtu/hr natural gas-fired amu;
   o) B029 – <9.9 mmBtu/hr natural gas-fired amu;
   p) B030 – <9.9 mmBtu/hr natural gas-fired amu;
   q) B032 – 6.55 mmBtu/hr natural gas-fired amu;

r) P100 – Diesel back-up generator (PBR #09127);
s) T001 – Solvent storage tank #1, virgin solvent (formerly Z028 – PTI #P0105840); and
t) T002 – Solvent storage tank #2, waste solvent (formerly Z029 – PTI #P0105840).

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

4. The insignificant emissions units at this facility which are listed in B.3.s and B.3.t (T001 and T002), are subject to the applicable requirements specified in 40 CFR Part 63, Subparts PPPP and MMMM, in accordance with 40 CFR Parts 63.3880 through 63.3981 and 40 CFR Part 63.4480 through 63.4581 [including the Table(s) and appendix(ices) referenced in Subpart MMMM and Subpart PPPP]. The applicable requirements of these rules, for these insignificant emissions units are summarized below:

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

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

(1) all coating operations as defined in 40 CFR 63.3981 and 63.4581;

(2) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

(4) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

In accordance with the above definition, this emissions unit is a component of the "affected source" (i.e. coating line R001) under the MMMM and PPPP MACT regulations and shall be included in all of the MACT requirements for R001. All emissions from this emissions unit shall be included in the compliance calculations for emissions unit R001 [see C.2.d)(12)].

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883 and 63.4483.

b) The permittee shall develop and implement a work practice plan in accordance with 40 CFR Part 63.3893(b) and 63.4493(b) to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation; or the permittee shall meet an alternative standard as provided in 40 CFR 63.3893(c) and 40 CFR 63.4493(c).

c) The permittee shall comply with the general requirements in accordance with 40 CFR 63.3900 and 63.3901; and 40 CFR 63.4500 and 63.4501.

d) The permittee shall comply with the requirement to submit notifications and reports in accordance with 40 CFR 63.3910 and 63.3920; and 40 CFR 63.4510 and 63.4520.

e) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), the permittee must demonstrate continuous compliance with the work practice standards in 63.3893 and 63.4493. Pursuant to 40 CFR 63.3930(k)(8) and 40 CFR 63.4530(k)(8), the permittee shall keep a record of the work practice plan required in 40 CFR 63.3893(b) and 40 CFR 63.4493(b), and documentation that the plan is being implemented on a continuous basis.

f) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), a statement shall be included in the facility's semiannual compliance report stating whether or not the facility is in compliance with the requirement to develop, implement, and maintain continuous compliance with the work practice plan.

g) The permittee shall demonstrate compliance with the work practice plan required in 40 CFR 63.3893 and 40 CFR 63.4493, by the dates and in the manner described pursuant to 40 CFR 63.3960 through 40 CFR 63.3968; and 40 CFR 63.4560 through 40 CFR 63.4568.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart MMMM and Subpart PPPP]

5. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 [including the Table(s) and appendix(ices) referenced in Subpart DDDDD]. The following insignificant emissions units in this permit are subject to the aforementioned requirements:

EU ID	Operations, Property and/or Equipment Description
B001	8 mmBtu/hr natural gas-fired hot water heater
B005	<9.9 mmBtu/hr natural gas-fired heater
B007	6.55 mmBtu/hr natural gas-fired amu
B008	6.23 mmBtu/hr natural gas-fired amu
B009	6.55 mmBtu/hr natural gas-fired amu
B010	4.03 mmBtu/hr natural gas-fired amu
B011	4.53 mmBtu/hr natural gas-fired amu
B015	<9.9 mmBtu/hr natural gas-fired amu
B023	<9.9 mmBtu/hr natural gas-fired amu
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B026	<9.9 mmBtu/hr natural gas-fired amu
B027	<9.9 mmBtu/hr natural gas-fired amu
B028	<9.9 mmBtu/hr natural gas-fired amu
B029	<9.9 mmBtu/hr natural gas-fired amu
B030	<9.9 mmBtu/hr natural gas-fired amu
B032	6.55 mmBtu/hr natural gas-fired amu

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

The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

a) The boilers identified above are designed to only burn gas 1 fuels (subcategory) and therefore is/are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/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: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart DDDDD]

5. The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (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. The existing stationary CI RICE, EU#P100, installed before 6/12/06,shall meet the requirements of Part 63, Subpart ZZZZ no later than 5/3/13.

The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f), and the permittee shall meet the following requirements contained in 40 CFR Part 63, Subpart ZZZZ:

66.6605 (a) & (b)	General Compliance
63.6602, Table 2c	Emissions Limitations – Maintenance requirements
63.6625 (e), (f), (h), and (i); 63.6635	Monitoring, Installation, Collection, Operation, & Maintenance
63.6630	Initial Compliance
63.6640 (a), (b), (e), & (f)	Continuous Compliance

63.6655 (a), (d), (e) and (f); 63.6660	Recordkeeping
66.6665	Table 8 General Provisions

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63, Subpart ZZZZ]

C. Emissions Unit Terms and Conditions

1. P001, Misc. Cleanup Operations

Operations, Property and/or Equipment Description:

Misc. Cleanup Operations

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

(1) d)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0114197, issued 01/14/14)	32.63 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation of the monthly VOC emissions. See b)(2)a.
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-3981)	See b)(2)b.
c.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)	See b)(2)c.
e.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface

Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

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

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

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

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

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

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

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

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

c) Operational Restrictions

(1) The permittee shall develop, implement, and maintain, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for

minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

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

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

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification of each cleanup material employed;

b. The number of gallons of each cleanup material employed;

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

d. The total VOC emission rate for each cleanup material employed [d)(1)b. x d)(1)c., divided by 2000], in tons;

e. The total VOC emission rate for all the cleanup materials employed [summation of d(1)d.], in tons; and

f. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) This permit allows for the use of the coatings and cleanup materials specified by the permittee. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the n-butyl acetate, ethyl acetate, n-butyl alcohol, ethyl alcohol, ethylene glycol monobutyl ether acetate, heptane, isobutyl acetate, isobutyl alcohol, isopropyl alcohol, methyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, n-propyl alcohol,

toluene, and xylenes emission limitations specified in PTI 03-0137 were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Trinity Consultants ISCST3, Version 1.12 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. All toxic constituents were assumed to be emitted at the highest rate of any of the constituents (xylenes, 32.63 g/s). This resulted in a peak one-hour predicted concentration of 2,075.96 ug/M^3, which was less than the MAGLC for each of the toxic constituents with the exception of ethylene glycol monobutyl ether acetate. This constituent was specifically ran at its calculated emission rate to determine a peak impact. The peak predicted concentration of this toxic was 58.66 ug/M^3 (MAGLC = 571 ug/M^3). The following table summarizes the results of the modeling for each pollutant:

Pollutant	TLV (ug/m3)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground-level Concentration at Fenceline (ug/m3)	Maximum acceptable Ground-level Concentration (MAGLC) (ug/m3)
n-butyl acetate	710000	5.13	2075.96	16905
ethyl acetate	1440000	1.84	2075.96	34286
n-butyl alcohol	152000	3024	2075.96	3619
ethyl alcohol	1880000	11.94	2075.96	44762
ethylene glycol monobutyl ether acetate	24000	0.76	58.66	571
heptane	1600000	0.60	2075.96	38095
isobutyl acetate	700000	0.60	2075.96	16667
isobutyl alcohol	150000	1.10	2075.96	3571
isopropyl alcohol	980000	14.60	2075.96	23333
methyl alcohol	260000	10.80	2075.96	6190
methyl ethyl detone	590000	14.85	2075.96	14048
methyl isobutyl ketone	205000	1.60	2075.96	4481
n-propyl alcohol	500000	12.40	2075.96	11905
toluene	375000	9.20	2075.96	8929
xylenes	435000	32.63	2075.96	10357

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

a. Any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value specified in the above table;

b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, or decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the MAGLC; and

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

[PTI #P0114197]

(3) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), the permittee must demonstrate continuous compliance with the work practice standards in 63.3893 and 63.4493. In accordance with 40 CFR 63.3930(k)(8) and 40 CFR 63.4530(k)(8), the permittee shall keep a record of the work practice plan required by 63.3893 and 63.4493, and documentation that the plan is being implemented on a continuous basis.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), a statement shall be included in the facility's semiannual compliance report stating whether or not the facility is in compliance with the requirement to develop, implement, and maintain continuous compliance with the work practice plan.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

f) Testing Requirements

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

a. Emission Limitations:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

g) Miscellaneous Requirements

(1) None.

2. P002, Paint Kitchen

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0114197, issued 01/14/14)	13.94 tons volatile organic compounds (VOC)/year, based upon a rolling, 12-month summation of the monthly VOC emissions. See b)(2)a.
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-3981)	See b)(2)b.
c.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)89	See b)(2)c.
e.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of 40 CFR, Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface

Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

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

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

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

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

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

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

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

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

c) Operational Restrictions

(1) The permittee shall develop, implement, and maintain, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for

minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

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

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

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification of each coating and cleanup material processed;

b. The number of gallons of each coating material processed;

c. The VOC content of each coating and cleanup material processed, in pounds per gallon;

d. The total VOC emission rate for each cleanup material employed [d)(1)b. x d)(1)c., divided by 2000], in tons;

e. The total VOC emission rate for all the cleanup materials employed [summation of d(1)d.], in tons; and

f. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) This permit addresses the current and proposed modified paint kitchen operations which are based on designs to optimize operational flexibility and production capability. Prior to making any physical change or change in the method of operation (i.e., changing coating material/ingredients, paint kettle size, etc.) at the facility which were not

incorporated into the initial design and could reasonably be expected to increase the production capability of this emissions unit, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final PTI modification prior to performing such change as required by OAC rule 3745-31. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(3) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), the permittee must demonstrate continuous compliance with the work practice standards in 63.3893 and 63.4493. In accordance with 40 CFR 63.3930(k)(8) and 40 CFR 63.4530(k)(8), the permittee shall keep a record of the work practice plan required by 63.3893 and 63.4493, and documentation that the plan is being implemented on a continuous basis.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month VOC emission limitation of 13.94 tons. All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) In accordance with 40 CFR 63.3963(e) and 40 CFR 63.4563(e), a statement shall be included in the facility's semiannual compliance report stating whether or not the facility is in compliance with the requirement to develop, implement, and maintain continuous compliance with the work practice plan.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

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>:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

g) Miscellaneous Requirements

(1) None.

3. P117, Mold Presses

Operations, Property and/or Equipment Description:

Mold Presses.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (PTI #P0114197, issued 01/14/14)	1.95 tons volatile organic compounds (VOC)/month averaged over a rolling 12-month period. See b)(2)a.
b.	OAC rule 3745-114 and ORC 3704.03 (F)	See d)(3), d)(4), d)(5), d)(6), and e)(2)

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each VOC-containing material (ThermoPlastic Olefin, sprayon environmental cleaner/degreaser, and slide mold release);

b. The number of pounds (lbs.) of each ThermoPlastic Olefin used;

c. The VOC content of each ThermoPlastic Olefin used (%);

d. The total VOC emissions from each ThermoPlastic Olefin used [d)(1)b. x d)(1)c. x an emissions factor of 1%], in lbs.;

e. The VOC content of each spray on environmental cleaner/degreaser and slide mold release used (in lb/gal.);

f. The number of gallons (gal.) of each sprayon environmental cleaner/degreaser and slide mold release;

g. The total VOC emissions from each spray on environmental cleaner/degreaser and slide mold release used [d)(1)e. x d)(1)f.], in lbs.;

h. The total VOC emissions from all VOC-containing material (ThermoPlastic Olefin, sprayon environmental cleaner/degreaser, and slide mold release) [sum of d)(1)d. + d)(1)g.]; and

i. Following the first 12 calendar months of operation, the rolling 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) This permit addresses the current and proposed modified molding press operations which are based on designs to optimize operational flexibility and production capability. Prior to making any physical change or change in the method of operation (i.e., changing molding material, press size, etc.) at the facility which were not incorporated into the initial design and could reasonably be expected to increase the production capability of this emissions unit, the permittee shall conduct an evaluation to determine if the change would constitute a “modification” as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final PTI modification prior to performing such change as required by OAC rule 3745-31. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(3) The permit-to-install (PTI) application for this emissions unit, P117, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA

guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

   Toxic Contaminant: hexane

   TLV (mg/m3): 176.24

   Maximum Hourly Emission Rate (lbs/hr): 0.235

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

   MAGLC (ug/m3): 4196.2

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

[PTI #P0114197]

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final permit-to-install (PTI) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[PTI #P0114197]

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to

be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI #P0114197]

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

[PTI #P0114197]

e) Reporting Requirements

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

a. All exceedances of the monthly VOC emission limitation of 1.95 tons averaged over a 12-month rolling period.

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

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

[PTI #P0114197]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

g) Miscellaneous Requirements

(1) None.

4. R001, Paint Line

Operations, Property and/or Equipment Description:

Paint Line #1

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0114197, issued 01/14/14)	<u>From the thermal oxidizer exhaust stack</u>: 28.2 lbs volatile organic compounds (VOC)/hr; 2.0 lbs nitrogen oxides (NOx)/hr and 8.76 tons NOx/yr; 1.0 lbs particulate matter less than 10 microns (PM10)/hr and 4.38 tons PM10/yr; and 3.0 lbs carbon monoxide (CO)/hr and 13.14 tons CO/yr. <u>From all natural gas combustion units not associated with the RTO stack</u>: 0.098 lbsNOx/mmBtu and 3.77 tons NOx/year; 0.0019 lb PM10/mmBtu and 0.09 ton PM10/year; and 0.082 lb CO/mmBtu and 3.15 tons CO/year. See b)(2)a. through b)(2)e. and b)(2)g.
b.	OAC rule 3745-31-05(D) (PTI #P0114197, issued 01/14/14)	143.77 tons VOC/year, based upon a rolling, 12-month summation of the monthly VOC emission rates [from the thermal oxidizer exhaust stack and total fugitive emissions*, combined]; *This includes VOCs emitted from paint sludge at the facility, where the sludge is

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

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

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a permanent total enclosure capturing exhaust gases from all paint booths, flash-off areas and bake ovens and exhausting to a regenerative thermal oxidizer in conjunction with an exhaust recirculation system. The bake ovens shall be fitted with low NOx burners. The regenerative thermal oxidizer shall ensure that 95% of the carbon in the organic material being incinerated is oxidized to carbon dioxide. Best available technology for paint application has been determined to be an automatic or robotic paint spray system using electrostatic applicators or equivalent technology and use of a water wash system for control of particulate emissions. The paint spray system shall achieve transfer efficiencies of 35 – 50%.

b. The permanent total enclosure shall be constructed to totally enclose the emissions unit such that all volatile organic compound emissions are captured, contained, and directed to the control device.

c. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). 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 b)(2)c.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.

d. 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.

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

f. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

g. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(C), 3745-21-07(M), and 3745-21-09(B)(6); and 40 CFR, Part 63, Subpart MMMM, and 40 CFR, Part 63, Subpart PPPP.

h. The control requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). For the purpose of this determination, all OC's are considered to be VOC's.

i. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface

Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

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

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

j. The options for compliance when using more than one type of coating are described in 40 CFR 63.3890(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.3930(c), and submit reports demonstrating compliance, as required in 63.3920. [See 40 CFR 63.3880-3981.]

k. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891, however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-3981.]

l. The permittee may comply with 40 CFR Part 63, Subpart MMMM and Subpart PPPP separately, or may select a predominant activity, or may calculate a facility-specific emission limit from the relative amount of coating activity that is subject to each emission limit. These options are described in 40 CFR 63.3881(e) and 63.4481(e). [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]

m. The coating operation shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and/or 40 CFR 63.4490 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581, at all times except during periods of startup, shutdown, and malfunction. The coating operation shall be operated in compliance with the work practice standards in 40 CFR 63.3893 and/or 40 CFR 63.4493 at all times. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]

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

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

i. all coating operations as defined in 40 CFR 63.4581;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

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

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

o. The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520. [See 40 CFR 63.4480-4581.]

p. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491,

however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

q. The permittee shall conduct or have conducted a performance test according to 40 CFR Part 63 Subpart MMMM sections 63.3964, 63.3965, and 63.3966 and/or 40 CFR Part 63 Subpart PPPP sections 63.4564, 63.4565, and 63.4566 for each capture system and the thermal oxidizer. The permittee shall establish the operating limits required by 40 CFR 63.3892 and 40 CFR 63.4492, and in accordance with 40 CFR 63.3967 and 40 CFR 63.4567, no later than 180 days after the compliance date specified in b)(2)i. and/or b)(2)n. above. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]

r. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:

i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.

ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.

iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.

iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

v. The SSMP shall be written for the following purpose:

(a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;

(b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;

(c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and

(d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.

vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.

viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.

ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:

(a) does not address a startup, shutdown, or malfunction event that has occurred;

(b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;

(c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or

(d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

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

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

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

x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).

xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.

xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the

relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

s. The emission standards set forth in 40 CFR Part 63, Subparts MMMM and PPPP shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit. [See 40 CFR 63.3880-3981 and 40 CFR 63.4480-4581.]

c) Operational Restrictions

(1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(2) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(3) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #P0114197]

(4) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI #P0114197]

(5) The permittee shall develop and implement, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste

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

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(6) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;

b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart MMMM, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;

c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;

d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;

e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;

f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;

g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(7) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

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

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

[OAC rule 3745-77-07(A)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.

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

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control

equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

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

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(6) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(8) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(9) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

a. The company identification for each coating and cleanup material employed in R001;

b. The VOC content of each coating and cleanup material, in pounds/gallon (excluding water and exempt solvents), as applied;

c. The number of gallons of each coating and cleanup material employed;

d. The total uncontrolled VOC emissions from each coating and cleanup material employed, in pounds [d)(10)b. x d)(10)c.];

e. The total stack (controlled) VOC emissions from all coating and cleanup materials employed, in pounds [summation of d)(10)d. x the control efficiency from the most recent stack test];

f. The amount of sludge collected, in pounds;

g. The total facility fugitive emissions of VOC resulting from the sludge, in tons, calculated as follows:

EF = 0.005 lb VOC/lb of sludge collected* x [the amount of sludge from d)(10)f. above]/2000, where EF is the facility fugitive emissions of VOC attributed to paint sludge, in tons per month;

h. The total VOC emissions generated at the facility (fugitive + stack), in tons [d)(10)e. + d)(10)g.];

i. The total fugitive emissions of VOC generated off site and resulting from the sludge, in tons, calculated as follows:

Ef = 0.04 lb VOC/lb of sludge collected* x [the amt. of sludge from d)(10)f. above]/2000 where Ef = the off-site fugitive emissions of VOC attributed to paint sludge, in tons per month;

j. The total VOC emissions (fugitive emissions generated at the facility + stack emissions generated at the facility + fugitive emissions generated off-site), in tons [d)(10)h. + d)(10)i.]; and

k. The rolling, 12-month summation of the total monthly VOC emission rates [calculated by summing the VOC emissions from d)(10)j. above, for the previous 11 calendar months + the VOC emissions for the current month], in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

$W_i$is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP, and

g. the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, calculated as follows:

$H_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$

where:

H_{TOT} is the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, i.e., the sum of the total mass of HAP calculated for each material, above; minus the calculated HAP in recovered materials, R_w, if meeting the requirements for this allowance.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$VOL_s = \sum_{h=1}^{m}(VOL_h)(V_h)$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the mass of organic HAP emission reduction for the month for the controlled coating operations, using the emissions capture system and the thermal oxidizer control, calculated as follows:

$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev}^*)\ (CE/100 \times DRE/100)$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations (or calculated for each system) during each month, in pound or kg.

* H_{dev} If an operating parameter deviates from that established as required in Table 1 to this subpart or if there is a malfunction of the CPMS equipment or the capture or control devices, the capture and control efficiency shall be assumed to be zero during the period of deviation unless an approval to use other efficiency data is obtained, per 40 CFR 63.3963(c)(2).

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r}(VOL_h)\,(D_h)(W_h)$$

where:

Ac is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

r is the number of coatings used in the coating operations controlled by the thermal oxidizer during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)\,(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

q is the number of thinners/additives used in the coating operations controlled by the thermal oxidizer during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)\,(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

s is the number of cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)\,(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in pound or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pounds/gallon or kg/liter.

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pound/pound or kg/kg.

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

DRE is the organic HAP destruction efficiency of the thermal oxidizer, in percent.

j. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = \left[H_2 - \sum_{b=1}^{x} HAP_{contr,b}\right] + \sum_{d=1}^{z} H_4$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in pound or kg.

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in (g) above.

H_2 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in the controlled coating operations, (H_2 is calculated as the sum of the total mass of HAP from all materials applied in the coating operation(s) controlled by a/the thermal oxidizer, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

H_4 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in any uncontrolled coating operations (H_4 is calculated as the sum of the total mass of HAP from all materials applied in each uncontrolled coating operation, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

$HAP_{contr,\ b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation "b", calculated as required in (i) above.

x is the number of controlled coating operations where emissions are captured and vented to the thermal oxidizer.

z is the number of coating operations without control.

k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids applied or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \frac{\sum_{y=1}^{n} HAP_{T,y}}{\sum_{y=1}^{n} VOL_{s,y}}$$

HAP_{comply} is the organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{T,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (j) above, in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(12) The permittee shall also maintain records of the following documentation for all controlled coating operations:

a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;

b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;

c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or

d. records for establishing the criteria for the temporary total enclosure or building enclosure:

i. if using the liquid-to-uncaptured-gas protocol the record shall include:

(a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;

(b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;

(c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

ii. if using the gas-to-gas protocol the record shall include:

(a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;

(b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;

f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;

g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(13) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be Installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that

could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(14) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Each pressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to

calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(15) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(16) The permittee shall maintain the following records for the continuous monitoring system (CMS) 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.

To avoid duplication of records, the permittee may maintain the records for the information in d)(15)f., d)(15)g., and d)(15)h. as part of the SSMP.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(17) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting

calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

e) Reporting Requirements

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

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit;

c. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(1)a. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(4) The permittee shall identify in the quarterly deviation report, all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

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

a. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation; and

b. All exceedances of the rolling, 12-month VOC emission limitation of 143.77 tons.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

(6) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

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

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

   i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

   ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

   iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

   iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

   v. the calculation of the total volume of coating solids used each month, as required in this permit;

   vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

   vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

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

ix. a brief description of the continuous parameter monitoring system (CPMS);

x. the date of the latest CPMS certification or audit;

xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(7) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(8) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(9) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

(10) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature

maintained and established during the most recent performance test that demonstrated compliance.

[OAC rule 3745-77-07(C)(1), PTI #P0114197, 40 CFR Part 63 Subpart MMMM, and 40 CFR Part 63 Subpart PPPP]

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:

95% control efficiency with 100% capture efficiency

Applicable Compliance Method:

The permittee has demonstrated compliance with the control and capture efficiency limitations based on the results of emissions testing conducted on May 4, 2010 (97.7% control efficiency and 100% capture efficiency). If required, the permittee shall demonstrate compliance with the control and capture efficiency limitations by testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

b. Emission Limitations:

28.2 lbs VOC/hour

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

c. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

d. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

e. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

f. Emission Limitations:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

g. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

h. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

i. Emission Limitations:

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

Applicable Compliance Method:

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0114197]

j. Emission Limitations:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1), PTI #P0114197, and 40 CFR Part 63 Subpart MMMM]

k. Emission Limitations:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1), PTI #P0114197, and 40 CFR Part 63 Subpart PPPP]

g) Miscellaneous Requirements

(1) None.