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

4/28/2014

Certified Mail

Facility ID: 0302020064
Permit Number: P0110424
County: Allen

Mr. Michael Tordella
Metokote Corporation Plant 25
1340 Neubrecht Road
Lima, OH 45801

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
Metokote Corporation Plant 25

Facility ID:	0302020064
Permit Number:	P0110424
Permit Type:	Renewal
Issued:	4/28/2014
Effective:	5/19/2014
Expiration:	5/19/2019

Division of Air Pollution Control
Title V Permit
for
Metokote Corporation Plant 25

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Authorization

Facility ID:	0302020064
Facility Description:	Metal coating and allied services.
Application Number(s):	A0044505, A0048764, A0049619
Permit Number:	P0110424
Permit Description:	Title V renewal permit for Miscellaneous Metal Parts coating facility.
Permit Type:	Renewal
Issue Date:	4/28/2014
Effective Date:	5/19/2014
Expiration Date:	5/19/2019
Superseded Permit Number:	P0106198

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

Metokote Corporation Plant 25
1340 Neubrecht Road
Lima, OH 45801

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 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 requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31 and/or in 40 CFR, Part 63, Subparts DDDDD or MMMM.

EU ID	Operations, Property and/or Equipment Description
B001	Steam boiler C3 (PTI #03-3737)
B003	Boiler C4 (PTI #03-4384)
B004	Steam boiler C10 (PTI #03-5088)
B007	Air make-up unit Bldg. #4 (5 mmBtu/hr natural gas fired)
B008	Air make-up unit Bldg. #5 (5 mmBtu/hr natural gas fired)
B009	Air make-up unit Bldg. #10 (5 mmBtu/hr natural gas fired)
B010	Air make-up unit Bldg. #2 (7.65 mmBtu/hr natural gas fired)
B011	Air make-up unit Bldg #2 (6.6 mmBtu/hr natural gas fired)
K001	Powder coating line #4 – MOP-2 (line 42)#248 C4 (PTI #03-24940)
K018	Powder coating line #4 – MOP-1 (line 41)#249 C4 (PTI #03-6488)
K043	Powder coating line with oven from K024 (formerly TMP 180459)
N004	Burn-off oven #4 BRN-23 (PTI #03-7525)
P003	Wheelabrator rack blaster #3 BLA-12 (PTI #03-3737)
P004	Rotary rack blaster #3 BLA-11 (Goff) (PTI #03-8240)
P013	Batch cure oven Bldg. #10 (PTI #03-4384)

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

3. The following significant emissions units contained in this permit are subject to 40 CFR, Part 63,Subpart MMMM -- Surface Coating of Miscellaneous Metal Parts and Products: K022, K023, K039, K041 and K042. 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]

4. 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 MMMM, in accordance with 40 CFR Parts 63.3880 through 63.3981 [including the Table(s) and appendix(ices) referenced in Subpart MMMM]. The following insignificant emissions units in this permit are subject to the aforementioned requirements:

EU ID	Operations, Property and/or Equipment Description
K001	Powder coating line #4 – MOP-2 (line 42)

EU ID	Operations, Property and/or Equipment Description
K018	Powder coating line #4 – MOP-1 (line 41)
K043	Powder coating line with oven from K024

The permittee shall comply with all applicable requirements of 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 MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart MMMM, and in Subpart A. 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 applicable requirements which are summarized below,are meant to help the permittee maintain compliance with this NESHAP:

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.

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:

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

(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, these emissions units are a component of the “affected sources” (i.e. the MACT coating lines at the facility) under the MMMM MACT regulations and shall be included in all of the MACT requirements for the facility.

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

b) Every individual coating used in this emissions unit, and all the thinners, additives, and cleaning/purge materials applied shall not contain any organic HAP. No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than

0.1% by mass. Organic HAP content shall be determined in accordance with 40 CFR 63.3941(a).

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

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	6.27 mmBtu/hr natural gas fired steam boiler C3 used for process heat
B003	6.27 mmBtu/hr natural gas fired steam boiler C4 used for process heat
B004	1.25 mmBtu/hr natural gas fired steam boiler C10 used for process heat

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]

C. Emissions Unit Terms and Conditions

1. K039, Dana Nylon PrimerBldg. #5

Operations, Property and/or Equipment Description:

Dana nylon primer (miscellaneous metal parts dip priming tank)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(2)(e)(iii)	The coating usage shall not exceed ten gallons per day.
b.	OAC rule 3745-31-05 (PTI #03-13931, issued 2/25/03)	69.80 lbs volatile organic compound (VOC)/day and 12.74 tons VOC/yr, from coating operations The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).
c.	40 CFR, Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this is a general use metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.]	63.3890(b)(1) or 63.3890(c): Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)a. through b)(2)c.
d.	40 CFR 63.1-15	Table 2 to Subpart MMMM of 40 CFR Part 63- Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 540 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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.

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.

b. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(b) – emission rate without add-on controls. 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-moth 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 63.3880-63.3981].

c. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

c) Operational Restrictions

(1) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

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

(2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit 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) and 40 CFR, Part 63, Subpart A (63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the volume, in gallons, of each coating employed;

c. the total volume, in gallons, of all of coatings employed.

d. the VOC content of each coating employed, in pounds/gallon, as applied;

e. the VOC emission rate for each coating employed [d)(1)b. times d)(1)d.];

f. the total VOC emission rate for all the coatings employed [summation of d)(1)e. for all coatings], in pounds; and

g. the year-to-date VOC emissions from all the coatings employed (summation of the VOC emissions for each calendar day from January thru December).

[OAC rule 3745-77-07(C)(1) and PTI #03-13931]

(2) 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 Hazardous Air Pollutants (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 (pounds 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: $V_s = 1 - m_{volatiles} / D_{avg}$

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 d)(2)e.iii.(a); and

(c) divide the gallons of solids, from d)(2)e.iii.(a), by the sum of the gallons of coating components from d)(2)e.iii.(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 d)2)b., in gallons or liters.

D_i is the density of material "i" as documented in d)(2)c., in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in d)(2)d., 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.

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

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

where:

HAP_{TOT} is the total mass of organic HAP emissions for the month, in pound or kg.

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 d)(2)f., 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 d)(2)f., 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 d)(2)f., 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 d)(2)b., in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e.

m is the number of coatings applied during the month.

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

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

where:

HAP_{comply} is the total 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.

$HAP_{TOT,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g., in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in d)(2)h., 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

j. 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) and 40 CFR, Part 63, Subpart MMMM]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

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

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

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

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) and 40 CFR, Part 63, Subpart MMMM]

(4) 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) and 40 CFR, Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office)

within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13931]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 69.80 pounds. 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 #03-13931]

(3) The permittee shall submit annual written reports of any deviations (excursions) from the annual coating material emissions limitation in section b)(1) of this permit. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

[OAC rule 3745-77-07(C)(1) and PTI #03-13931]

(4) The permittee shall submit semiannual 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 the 6-month period 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 beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

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 for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

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, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the coating operations demonstrating compliance without add-on control, 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. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

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

iv. a statement of the cause of each deviation.

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

(5) 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) and 40 CFR, Part 63, Subpart MMMM]

f) Testing Requirements

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

a. Emission Limitation:

For the coatings employed for the miscellaneous metal parts, the coating usage shall not exceed ten gallons per day

Applicable Compliance Method:

The record keeping requirements in Section d)(1) of this permit shall be used to determine compliance with the coating usage restriction above.

[OAC rule 3745-77-07(C)(1) and PTI #03-13931]

b. Emission Limitations:

69.80 lbs VOC/day and 12.74 tons VOC/yr, from coating usage

Applicable Compliance Method:

The record keeping requirements in Section d)(1) of this permit shall be used to determine compliance with the limitations above. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-13931]

c. Emission Limitations:

Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Methods:

Compliance shall be based upon the record keeping specified in d)(2).

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

g) Miscellaneous Requirements

(1) None.

2. K041, Wet Paint Line

Operations, Property and/or Equipment Description:

Miscellaneous metal parts wet paint line with dry filtration system and 5 million Btu per hour natural gas fired drying oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0104203, issued on 12/26/08)	9.60 lbs organic compounds (OC)/hr and 42.05 tons OC/yr from coating operations 367.5 lbs OC/month and 2.21 tons OC/yr from clean-up operations
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)a.
c.	OAC rule 3745-17-11(C)	See b)(2)b., and c)(1)
d.	40 CFR, Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this is a high performance metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.]	<u>63.3890(b)(2) or 63.3890(c)</u>: Emissions of organic hazardous air pollutants (HAPs) shall not exceed 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)d. through b)(2)f.
e.	40 CFR 63.1-15	Table 2 to Subpart MMMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c. The 9.60 lbs VOC/hr emission limitation represents the potential to emit for coating operations. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

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

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

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

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

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

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

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

e. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(a) – compliant coating. 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 63.3880-63.3981].

f. The permittee, using the “compliant material” option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual

coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter 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 dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #P0104203]

(2) The permittee shall expeditiously repair the dry particulate filter 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 #P0104203]

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

[OAC rule 3745-77-07(A)(1), PTI #P0104203, and 40 CFR Part 63, Subpart MMMM]

(4) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit 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) and 40 CFR, Part 63, Subpart A (63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, 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 #P0104203]

(2) The permittee shall conduct periodic inspections of the dry particulate filter 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 bebased 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 #P0104203]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter 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 #P0104203]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter 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 #P0104203]

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter 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 #P0104203]

(6) The permittee shall collect and record the following information each month for coating material usage in emission unit K041:

a. The name and identification for each coating material employed;

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

c. The organic compound content, in pounds per gallon, for each coating as applied;

d. The organic compound emission rate for each coating employed, in lbs/month [d)(6)b. times d)(6)c];

e. The total organic compound emission rate for all coating materials employed [summation of d)(6)d. for all coatings]; and

f. The annual, year to date, organic compound emissions from all coatings employed [summation of d)(6)e. for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(7) The permittee, having chosen to demonstrate compliance with OAC rule 3745-21-09(U) through the use of compliant coatings, shall collect and record the following information each month for the coating operations and shall maintain this information at the facility for a period of three years:

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

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture. These records shall be maintained for a period of not less than three years.

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(8) The permittee shall collect and record the following information each month for clean-up material usage in emissions unit K041:

a. The company identification of each cleanup material employed;

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

c. The organic compound content, in pounds per gallon, for each cleanup material employed;

d. The organic compound emission rate for each cleanup material employed, in lbs/month [d)(8)b. times d)(8)c.];

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density);

e. The total organic compound emission rate for all cleanup materials employed [summation of d)(8)d. for all cleanup materials employed]; and

f. The annual, year to date organic compound emissions from all cleanup materials employed [summation of d)(8)e. for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(9) 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 at a minimum:

i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,

iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.3890 and that each thinner, additive, and cleanup material applied in the miscellaneous metal parts coating operations contained no organic HAP*;

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 Hazardous Air Pollutants (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 (pounds 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: $V_s = 1 - m_{volatiles} / D_{avg}$

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 d)(9)e.iii.(a); and

(c) divide the gallons of solids, from d)(9)e.iii.(a) by the sum of the gallons of coating components from d)(9)e.iii.(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 organic HAP content of each coating, in pound of organic HAP emitted per gallon of coating solids used or kg of organic HAP emitted per liter of coating solids used, calculated as follows for each coating applied in the miscellaneous metal parts coating operations using the "compliant material" option:

$H_{c=} (D_c) (W_c) / V_s$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per liter of coating solids used or pound of organic HAP emitted per gallon of coating solids used.

D_c is the density of coating "c", in kg coating per liter of coating or pound(s) of coating per gallon of coating, as determined in d)(9)(c).

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in d)(9)d.

V_s is the volume fraction of coating solids in coating "c", liter of coating solids per liter coating, or gallon of coating solids per gallon of coating, as determined in d)(9)e.; and

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

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.3890; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

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.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

(10) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

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

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

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

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 #P0104203, and 40 CFR Part 63 Subpart MMMM]

(11) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period.The quarterly deviation 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 #P0104203]

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings,

as defined in OAC rule 3745-21-09(U). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(3) The permittee shall submit annual reports that summarize the total annual actual OC emissions from coating operations for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(4) The permittee shall submit annual reports that summarize the total annual actual OC emissions from cleanup operations for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0104203]

(5) The permittee shall submit semiannual 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 the 6-month period 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 beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

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 for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

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, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information:

i. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

ii. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

iv. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

(6) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

f) Testing Requirements

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

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

9.60 lbs OC/hr from coating operations

<u>Applicable Compliance Method:</u>

The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly coating usage rate (3.0 gal/hr) by the maximum VOC content of all coatings (3.20 lbs/gal).

[OAC 3745-77-07(C)(1) and PTI #P0104203]

b. Emissions Limitation:

42.05 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(6).

[OAC 3745-77-07(C)(1) and PTI #P0104203]

c. Emissions Limitations:

367.5 lbs OC per month and 2.21 tons/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(8).

[OAC 3745-77-07(C)(1) and PTI #P0104203]

d. Emissions Limitation:

Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(7).

[OAC 3745-77-07(C)(1) and PTI #P0104203]

e. Emissions Limitation:

Emissions of organic hazardous air pollutants (HAPs) shall not exceed 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(9).

[OAC 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

3. K042, Wet Spray Paint and/or Powder Coating Line 4-7

Operations, Property and/or Equipment Description:

Wet spray paint and/or powder coating line 4-7 for automotive miscellaneous metal parts with natural gas fired dry off tunnel, natural gas fired cure oven, dry filtration system for wet spray paint particulate control and a cartridge filter reclamation system for powder coatings.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (PTI # P0107498, issued 02/01/2011)	Volatile organic compound (VOC) emissions from the coating and cleanup operations combined shall not exceed 55.45 tons of VOC/rolling, 12-month period [See b)(2)a.]
b.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for all coatings
c.	OAC rule 3745-17-11(C)	See b)(2)b. and c)(1)
d.	40 CFR, Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this is a high performance metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.]	<u>63.3890(b)(2) or 63.3890(c)</u>: Emissions of organic hazardous air pollutants (HAPs) shall not exceed 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)d. through b)(2)f.
e.	40 CFR 63.1-15	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements under ORC 3704.03(T) have been determined to be the compliance with the rolling 12-month VOC limitation.

b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c. The emissions from the natural gas fired dry off tunnel and cure oven associated with this emissions unit are negligible.

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

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

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

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

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

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

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

e. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(b) – emission rate without add-on controls. 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-moth 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 63.3880-63.3981].

f. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter 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 dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #P0107498]

(2) The permittee shall expeditiously repair the dry particulate filter 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 #P0107498]

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

[OAC rule 3745-77-07(A)(1), PTI #P0107498, and 40 CFR Part 63, Subpart MMMM]

(4) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit 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 #P0107498, and 40 CFR, Part 63, Subpart A (63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, 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 Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

(2) The permittee shall conduct periodic inspections of the dry particulate filter 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 #P0107498]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter 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 #P0107498]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter 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 Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter 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 #P0107498]

(6) The permittee shall collect and record the following information each month for all coating and cleanup materials employed in emissions unit K042:

a. the name and identification number of each material (coating and cleanup) employed;

b. the VOC content of each coating (excluding water and exempt solvents employed, in pounds per gallon, as applied [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

c. the VOC content of each material (coating and cleanup) employed, in pounds per gallon, as applied;

d. the number of gallons of each material (coating and cleanup) employed;

e. the VOC emission rate for each material (coating and cleanup) employed [d)(6)c. times d)(6)d.], in pounds;

f. the total VOC emission rate for all materials (coating and cleanup) employed [summation of d)(6)e. for all materials], in pounds or tons; and

g. the rolling, 12-month VOC emission rate for all materials (coating and cleanup) employed, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

(7) 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 at a minimum:

i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,

iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.3890 and that each thinner, additive, and cleanup material applied in the miscellaneous metal parts coating operations contained no organic HAP*;

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 Hazardous Air Pollutants (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 (pounds 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: $V_s = 1 - m_{volatiles} / D_{avg}$

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 d)(7)e.iii.(a); and

(c) divide the gallons of solids, from d)(7)e.iii.(a) by the sum of the gallons of coating components from d)(7)e.iii.(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 organic HAP content of each coating, in pound of organic HAP emitted per gallon of coating solids used or kg of organic HAP emitted per liter of coating solids used, calculated as follows for each coating applied in the miscellaneous metal parts coating operations using the "compliant material" option:

$H_{c=} (D_c) (W_c) / V_s$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per liter of coating solids used or pound of organic HAP emitted per gallon of coating solids used.

D_c is the density of coating "c", in kg coating per liter of coating or pound(s) of coating per gallon of coating, as determined in d)(7)c.

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in d)(7)d.

V_s is the volume fraction of coating solids in coating "c", liter of coating solids per liter coating, or gallon of coating solids per gallon of coating, as determined in d)(7)e.; and

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

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.3890; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

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.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

[OAC rule 3745-77-07(C)(1), PTI #P0107498, and 40 CFR Part 63 Subpart MMMM]

(8) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

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

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

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

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 #P0107498, and 40 CFR Part 63 Subpart MMMM]

(9) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

[OAC rule 3745-77-07(C)(1), PTI #P0107498, and 40 CFR Part 63 Subpart MMMM]

e) Reporting Requirements

(1) The reports required by this permit must be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

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

a. all exceedances of the rolling, 12-month VOC emission limitation specified in condition b)(1)a.;

b. any daily record showing that the dry particulate filter 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;

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 #P0107498]

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings, as defined in OAC rule 3745-21-09(U). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

(4) The permittee shall submit semiannual 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 the 6-month period 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 beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

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 for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

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, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information:

   i. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

   ii. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

iv. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

(5) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[OAC rule 3745-77-07(C)(1), PTI #P0104203, and 40 CFR Part 63 Subpart MMMM]

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions from the coating and cleanup operations combined shall not exceed 55.45 tons of VOC/rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements as specified in section d)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

b. Emissions Limitation:

3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for all coatings

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section d)(6)b. of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0107498]

c. Emissions Limitation:

Emissions of organic hazardous air pollutants (HAPs) shall not exceed 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide

emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(7).

[OAC rule 3745-77-07(C)(1), PTI #P0107498, 40 CFR Part 63 Subpart MMMM]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

[OAC rule 3745-77-07(C)(1), PTI #P0107498, 40 CFR Part 63 Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

4. N005, Blu-Surf Burn Off Oven

Operations, Property and/or Equipment Description:

2 mmBtu/hr natural gas-fired, 1250 lb/hr burn off oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (PTI #P0115513, issued 10/02/2013)	1.25 lb particulate emissions (PE)/hr; 5.48 ton PE/yr [See b)(2)a.] Visible PE from this emissions unit shall not exceed 5% opacity, except for six minutes in any continuous sixty-minute period during which the opacity shall not exceed 10%. See b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
c.	OAC rule 3745-17-09(B)	0.10 lb PE/100 lbs of liquid, semi-solid, or solid refuse and salvageable material charged into the incinerator
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. All particulate emissions are assumed to be particulate matter less than 10 microns in size (PM10).

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of a secondary combustion chamber (afterburner) and compliance with the terms and conditions of this permit.

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

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

"The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter less than 10 microns in size (PM10) from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons/yr taking into account the federally enforceable rule limit of 0.10 lbs PE/100 tons of material charged under OAC rule 3745-17-09(B)."

c) Operational Restrictions

(1) This emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the oven, or physically modify the oven in any way, without first verifying, with the manufacturer, that the change(s) would not adversely affect air contaminant emissions from this unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0105513]

(2) This emissions unit shall be designed and operated in accordance with the following requirements:

a. The secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures; and

b. The secondary combustion chamber shall allow for a minimum 0.5 second retention time at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

[OAC rule 3745-77-07(A)(1) and PTI #P0105513]

(3) The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this oven and shall comply with the following operational restrictions:

a. The permittee shall ensure that the burn-off oven is operated only by properly trained personnel who have read, and understand, the oven's operation manual;

b. Prior to start-up of the oven, the permittee shall remove ash residue left inside the oven after the previous burn cycle;

c. The permittee shall not operate the oven if the built-in safeguards and interlocks (oven excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and

d. The permittee shall not process uncured paint or paint sludge, paint filters, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, or any hazardous waste materials as defined in 40 CFR, Part 261, Subpart D in this oven. Paint hooks covered with coatings that may contain chlorine (PVC), fluorine (Teflon), or elements other than carbon, hydrogen, and oxygen are also prohibited from being processed in this oven.

[OAC rule 3745-77-07(A)(1) and PTI #P0105513]

(4) The permittee shall properly operate and maintain the monitoring devices associated with the oven's safeguards and interlock system [See c)(3)c. above].

[OAC rule 3745-77-07(A)(1) and PTI #P0105513]

(5) The permittee shall not allow the operation of this emissions unit to cause a public nuisance in violation of OAC rule 3745-15-07.

[OAC rule 3745-77-07(A)(1) and PTI #P0105513]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

(2) The permittee shall maintain an operation/maintenance record for this emissions unit. Record shall contain the following information:

a. The dates the emissions unit was operated;

b. The number of batches processed for each date the emission unit was operated;

c. The date of any malfunction of the emissions unit's safeguards/interlocks [See c)(3)c.], the corrective action taken, and the date it was completed; and

d. The dates and descriptions of any additional maintenance activities performed on the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:

a. The date of the excursion;

b. The temperature values during the excursion;

c. The cause(s) for the excursion; and

d. The corrective action which has been or will be taken to prevent similar excursions in the future.

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

f) Testing Requirements

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

a. Emission Limitation:

0.10 lbPE/100 lbs of liquid, semi-solid, or solid refuse and salvageable material charged into the incinerator

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with OAC rule 3745-17-03(B)(8).

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

b. Emission Limitations:

1.25 lb PE/hr; 5.48 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance by multiplying the emission limitation of 0.10 lb PE/100 lbs material charged by a maximum charging capacity of 1250 lbs/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

c. Emission Limitation:

Visible PE from this emissions unit shall not exceed 5% opacity, except for six minutes in any continuous sixty-minute period during which the opacity shall not exceed 10%.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

d. Emission Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0105513]

g) Miscellaneous Requirements

(1) None.

5. P029, LINE30

Operations, Property and/or Equipment Description:

Aluminum Adhesion Pretreatment Line with a mist eliminator and a 2.5 mmBtu/hr heat exchanger (formerly TMP181010)

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

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

(2) OAC rule 3745-31-05(E): b)(1)c. and b)(2)d., c)(1), c)(2), d)(6), d)(7) and e)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0115609 issued 11/07/13)	Volatile Organic Compound (VOC) emissions shall not exceed 2.34 tons per month averaged over a 12-month rolling period See b)(2)a., b)(2)b. and b)(2)f.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (PTI #P0115609 issued 11/07/13)	See b)(2)c.
c.	OAC rule 3745-31-05(E)	See b)(2)d., c)(1), c)(2), d)(6), d)(7) and e)(4)
d.	OAC rule 3745-21-07(M)	See b)(2)e.
e.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(2) through d)(5) and e)(3)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be compliance with the tons per month averaged over a rolling, 12-month period established in b)(1)a.

b. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for

NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the mist eliminator and control requirements established pursuant to OAC rule 3745-31-05(E) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC from emissions unit P029 is less than 10 tons per year.

It should be noted that the mist eliminator and control requirements established pursuant to OAC rule 3745-31-05(E) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. The Ohio EPA is establishing requirements under OAC rule 3745-31-05(E) "State-only enforceable limitations" for the installation and operation of the voluntary mist eliminator. The requirements of OAC rule 3745-31-05(E) contained in this permit are a necessary component to control nitric acid emissions below the air toxics modeling threshold of one ton per year.

e. This emissions unit is not subject to the requirements of the rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

f. The emissions from natural gas combustion are considered to be negligible and will not be included in this permit [See g)(2)].

c) Operational Restrictions

(1) The permittee shall install and operate a mist eliminator for the control of nitric acid emissions whenever this emissions unit is in operation and shall maintain the mist eliminator in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI# P0115609]

(2) In the event the mist eliminator is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI# P0115609]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the VOC emissions from this emissions unit; and at the end of 12 months of operation, the rolling 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.

Note: The above records shall be determined in accordance with the emissions calculations presented to the Ohio EPA in the permit application submitted by the permittee.

[OAC rule 3745-77-07(C)(1) and PTI# P0115609]

(2) The PTI application for this emissions unit 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(s) 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(s) 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(s) emitted from the emissions unit(s), (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/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" 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 x 8/X x 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: Glycol Ether

TLV (mg/m3): 66.33

Maximum Hourly Emission Rate (lbs/hr): 1.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 245.5

MAGLC (ug/m3): 1579.20

The permittee, has demonstrated that emissions of glycol ether, from emissions unit P029, 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# P0115609]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 or its 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 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# P0115609]

(4) 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 or the materials applied.

[PTI# P0115609]

(5) 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# P0115609]

(6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the mist eliminator, 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# P0115609]

(7) The permittee shall maintain daily records that document any time periods when the mist eliminator was not in service when the emissions unit was in operation, as well as, a record of all operations during which the mist eliminator 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# P0115609]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1) and PTI# P0115609]

(2) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI# P0115609]

(3) 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, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[PTI# P0115609]

(4) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the mist eliminator 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. The notification shall

include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI# P0115609]

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 2.34 tons per month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the ton(s) per month averaged over a 12-month rolling period shall be determined in accordance with the record keeping requirements established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0115609]

g) Miscellaneous Requirements

(1) NOx emissions represent the highest pollutant from the burning of natural gas. The potential to emit for NOx was determined by using an emission factor of 0.10 lbNOx/MMBtu for boilers less than 100 MMBtu/hr [AP-42 Section 1.4 (7/98)], as follows:

(0.10 lbNOx/MMBtu) x (2.5 MMBtu/hr) = 0.25 lbNOx/hr
(0.25 lbNOx/hr) x (24 hrs/day)= 6.0 lbsNOx/day
(0.25 lbNOx/hr) x (8760 hrs/yr) x (1 ton/2000 lbs) = 1.09 tons NOx/yr

[PTI# P0115609]

6. Emissions Unit Group -A: K022,K023,

EU ID	Operations, Property and/or Equipment Description
K022	primer electrodeposition line, E-coat #33
K023	primer electrodeposition line, E-coat #34

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
b.	OAC rule 3745-31-05 (PTI # 03-4384, issued 10/4/89)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(U)(1)(c).
c.	40 CFR, Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this is a general use metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.]	<u>63.3890(b)(1) or 63.3890(c)</u>: Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)a. through b)(2)c.
d.	40 CFR 63.1-15	Table 2 to Subpart MMMM of 40 CFR Part 63- Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 540 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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.

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.

b. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(b) – emission rate without add-on controls. 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-moth 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 63.3880-63.3981].

c. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

c) Operational Restrictions

(1) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

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

(2) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit 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) and 40 CFR, Part 63, Subpart A (63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each material added to the dip tank; and

b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank.

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

(2) 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 Hazardous Air Pollutants (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 (pounds 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: $V_s = 1 - m_{volatiles} / D_{avg}$

   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 d)(2)e.iii.(a), above; and

(c) divide the gallons of solids, from d)(2)e.iii.(a), by the sum of the gallons of coating components from d)(2)e.iii.(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 d)(2)b., in gallons or liters.

D_i is the density of material "i" as documented in d)(2)c., in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in d)(2)d., 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.

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

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

where:

HAP_{TOT} is the total mass of organic HAP emissions for the month, in pound or kg.

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 d)(2)f., 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 d)(2)f., 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 d)(2)f., 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 d)(2)b., in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e.

m is the number of coatings applied during the month.

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

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

where:

HAP_{comply} is the total 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.

$HAP_{TOT,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g., 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

j. 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) and 40 CFR, Part 63, Subpart MMMM]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

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

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

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

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) and 40 CFR, Part 63, Subpart MMMM]

(4) 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) and 40 CFR, Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings, as defined in OAC rule 3745-21-09(U). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

(2) The permittee shall submit semiannual 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 the 6-month period 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 beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

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 for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

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, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the coating operations demonstrating compliance without add-on control, 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. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

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

   iv. a statement of the cause of each deviation.

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

(3) 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) and 40 CFR, Part 63, Subpart MMMM]

f) Testing Requirements

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

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

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

<u>Applicable Compliance Method:</u>

Compliance with this limitation shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(U)(1)(c)]

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

Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

<u>Applicable Compliance Method:</u>

Compliance shall be based upon the record keeping specified in d)(2).

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

(2) USEPA Method 24 shall be used to determine the VOC content of each material added to the electrocoating dip tank. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular material, the permittee shall notify the Administrator of the USEPA and shall use

formulation data for that material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

g) Miscellaneous Requirements

(1) None.