



6/4/2014

Mr. Andy Ustaszewski  
Pittsburgh Glass Works, LLC  
5066 Lincoln Highway  
Crestline, OH 44827

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0370000217  
Permit Number: P0116936  
Permit Type: Initial Installation  
County: Richland

Certified Mail

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| No  | MACT/GACT                          |
| No  | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MODELING SUBMITTED                 |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V   |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No  | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Mansfield News-Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

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-NWDO; Canada



PUBLIC NOTICE

6/4/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Pittsburgh Glass Works, LLC

5066 Lincoln Highway,

Crestline, OH 44827

Richland County

FACILITY DESC.: Glass Product Manufacturing Made of Purchased Glass

PERMIT #: P0116936

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of three (3) Window Assembly Lines.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permit serves to permit three new Window Assembly Lines. The permit will incorporate the synthetic minor limitations that were previously established in PTI #03-13402, issued on February 27, 2001.

3. Facility Emissions and Attainment Status:

This facility has requested synthetic minor restrictions because the facility's potential emissions of volatile organic compounds (VOC) exceeds 100 tons per year and potential emissions of hazardous air pollutants (HAP) exceeds 10 tons per year for a single HAP and 25 tons per year for combined HAPs. Federally enforceable restrictions will lower potential emissions of the above mentioned pollutants to below Title V and MACT major source thresholds. Pittsburgh Glass Works, LLC is located in Richland County and is classified as a minor facility for Title V purposes. Richland County is designated attainment for all criteria pollutants.

4. Source Emissions:

The company has requested the following maximum, annual coating usage rates for emissions units K004, P017, P019-P047, and P050-P052, combined, in order to reduce their annual emissions rates to avoid the requirements of Title V permitting:

- a. 3,050 gallons of coatings, adhesives, and cleanup materials with a maximum VOC content of 11.0 pounds/gallon per rolling, 12-month period;
- b. 25,067 gallons of coatings, adhesives, and cleanup materials with a maximum VOC content of 7.0 pounds/gallon per rolling, 12-month period; and
- c. 25,067 gallons for all coatings, adhesives, and cleanup materials combined per rolling, 12-month period.

These emission rates result in an annual VOC emission rate of 93.86 tons VOC per rolling, 12-month period for emissions units K004, P017, P019-P047, and P050-P052, combined.

The facility has also requested the following federally enforceable HAP emission rates for emissions units K004, P017, P019-P047 and P050-P052, combined, in order to avoid the requirements of MACT permitting:

- a. 9.90 tons per rolling, 12-month period for any individual HAP; and
- b. 24.90 tons per rolling, 12-month period for any combination of HAPs.



5. Conclusion:

In order to avoid Title V permitting requirements and MACT applicability, federally enforceable limits will be imposed on Pittsburgh Glass Works, LLC for combined VOC and HAPs emissions to ensure the facility's potential emission rates remain below the Title V and MACT significance thresholds.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <b>Pollutant</b> | <b>TPY</b>  |
|------------------|---|
| VOC              | 93.86 tons/rolling, 12-month period for K004, P017, P019 - P047, and P050-P052 combined |
| HAPs             | 9.90 tons/rolling, 12-month period for K004, P017, P019 - P047, and P050-P052 combined  |
| HAPs             | 24.90 tons/rolling, 12-month period for K004, P017, P019 - P047, and P50-P052, combined |



**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Pittsburgh Glass Works, LLC

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 0370000217                        |
| Permit Number: | P0116936                          |
| Permit Type:   | Initial Installation              |
| Issued:        | 6/4/2014                          |
| Effective:     | To be entered upon final issuance |
| Expiration:    | To be entered upon final issuance |





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Pittsburgh Glass Works, LLC

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**Draft Permit-to-Install and Operate**

Pittsburgh Glass Works, LLC

**Permit Number:** P0116936

**Facility ID:** 0370000217

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0370000217  
Application Number(s): A0050453  
Permit Number: P0116936  
Permit Description: Installation of three (3) Window Assembly Lines.  
Permit Type: Initial Installation  
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 6/4/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Pittsburgh Glass Works, LLC  
5066 Lincoln Highway  
Crestline, OH 44827

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0116936

Permit Description: Installation of three (3) Window Assembly Lines.

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

**Group Name: Window Assembly Lines 20-22**

|                                   |                         |
|-----------------------------------|-------------------------|
| <b>Emissions Unit ID:</b>         | <b>P050</b>             |
| Company Equipment ID:             | Window Assembly Line 20 |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |
| <b>Emissions Unit ID:</b>         | <b>P051</b>             |
| Company Equipment ID:             | Window Assembly Line 21 |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |
| <b>Emissions Unit ID:</b>         | <b>P052</b>             |
| Company Equipment ID:             | Window Assembly Line 22 |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |



**Draft Permit-to-Install and Operate**

Pittsburgh Glass Works, LLC

**Permit Number:** P0116936

**Facility ID:** 0370000217

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**

Pittsburgh Glass Works, LLC

**Permit Number:** P0116936

**Facility ID:** 0370000217

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

Pittsburgh Glass Works, LLC

**Permit Number:** P0116936

**Facility ID:** 0370000217

**Effective Date:** To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Draft Permit-to-Install and Operate**

Pittsburgh Glass Works, LLC

**Permit Number:** P0116936

**Facility ID:** 0370000217

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -Window Assembly Lines 20-22: P050,P051,P052,**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b> |
|--------------|--|
| P050         | Window Assembly Line 20                                  |
| P051         | Window Assembly Line 21: Door/ Sidelight Bonding Line    |
| P052         | Window Assembly Line 22: Clip Priming                    |

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., b)(2)e., c)(1), c)(2), c)(3), d)(2), d)(3), d)(4), e)(2), f)(1)a. and f)(1)b.

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.

|    | <b>Applicable Rules/Requirements</b>             | <b>Applicable Emissions Limitations/Control Measures</b>   |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | See b)(2)a.  |
| b. | OAC rule 3745-31-05(A), as effective 12/01/06    | See b)(2)c.  |
| c. | OAC rule 3745-21-07(M)                           | None, see b)(2)d.  |
| d. | OAC rule 3745-31-05(D)                           | 93.86 tons volatile organic compounds (VOC) per rolling, 12-month period for emissions units K004, P017, P019-P047, and P050-P052, combined<br><br>9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP*) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, P017, P019-P047, and P050-P052, combined |
| e. | ORC 3704.03(F) and OAC rule                      | See g)(1).   |



|  | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|--|-------------------------------|---|
|  | 3745-114-01                   |   |

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01, have been determined to be compliance with the material specifications established under OAC rule 3745-31-05(D) which restrict the VOC content of material used [see c)(1)].

The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective 11/30/01, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

- b. Emissions from cleanup operations for an individual window assembly line are negligible and; therefore, have not been addressed by an individual emission limitation for each window assembly line. Emissions from cleanup operations are included in the combined VOC limitation established under OAC rule 3745-31-05(D).
- 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 SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compound (VOC) emissions from these air contaminant sources since the uncontrolled potential to emit for VOC individually is less than ten tons per year.

- d. These emissions units are not subject to the requirements of the rule because they do not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).
- e. The permittee has requested federally enforceable limitations for emissions units K004 and P017, P019-P047, and P050-P052, of 93.86 tons of VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period. These limitations are based on VOC/HAP content and gallon usage



restrictions for the purpose of avoiding Title V applicability [See c)(1), c)(2) and c)(3)].

Federally enforceable limitations for VOC and HAPs were initially established in Permit-to-install 03-13402 issued on 2/27/01 and, as such the facility has existing records for VOC and HAP emissions in lieu of establishing monthly emission restrictions for the first year of operation.

c) Operational Restrictions

- (1) The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
- (2) The maximum annual coating usage for emissions units K004, P017, P019-P047, and P050-P052, combined shall not exceed any of the following:
  - a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
  - b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
  - c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

Compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- (3) Combined annual HAP emissions from emissions units K004, P017, P019-P047, and P050-P052 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon rolling, 12-month summations of the monthly HAP emissions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P050, P051 and P052 individually:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all coatings employed;
  - e. the annual coating usage for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;



- f. the VOC emission rate for each coating, in pounds per month;
  - g. the total VOC emission rate for all coatings, in pounds or tons per month; and
  - h. the total VOC emissions from all coating materials employed in each emissions unit [summation of d)(1)g. for each calendar month to date from January to December].
- (2) The permittee shall collect and record the following information each month for emissions units K004, P017, P019-P047, and P050-P052, combined:
- a. The company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in lbs VOC/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material [d)(2)b. x d)(2)c. x 1 ton/2000 lbs.] in tons/month;
  - e. the total VOC emission rate for all coatings and cleanup materials [summation of (d)(2)d. in tons per month]; and
  - f. the rolling, 12-month summation of the VOC emissions, in tons.
- (3) In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017, P019-P047, and P050-P052, combined:
- a. The annual\* number of gallons of each coating and cleanup material;
  - b. The annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating and cleanup material;
  - c. The annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating and cleanup material; and
  - d. The annual\* number of gallons of all coatings and cleanup materials.
- \*Based upon a rolling, 12-month summation of the coating usage rates.
- (4) The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K004, P017, P019-P047, and P050-P052, combined:
- a. the company identification of each coating and cleanup material employed;
  - b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;



- d. the emission rate for each HAP from each coating and cleanup material employed [d)(4)b. x d)(4)c. in lbs/month];
- e. the total emission rate for each HAP from all coatings and cleanup materials employed [summation of d)(4)d.] in lbs/month;
- f. the total HAP emissions rate for all combined HAPs from all coatings and cleanup materials employed [summation of d)(4)e.] in lbs/month; and
- g. the rolling, 12-month summations for each individual HAP and all combined HAPs emissions, in tons..

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month VOC emission limitation of 93.86 tons;
    - ii. the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs c)(1) and c)(2); and
    - iii. the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph c)(3).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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



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:

93.86 tons VOC per rolling, 12-month period (for emissions units K004, P017, P019-P047, and P050-P052, combined)

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in d)(2).

b. Emission Limitation:

9.9 tons per rolling, 12-month period of any individual HAP and 24.9 tons per rolling, 12-month period of any combination of HAPs (for emissions units K004, P017, P019-P047, and P050-P052, combined)

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in d)(4).

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

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the maximum annual emissions for each toxic air contaminant (from emission units P050, P051 and P052 combined), as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.