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

8/4/2014

Certified Mail

Facility ID: 0306010138
Permit Number: P0116220
County: Auglaize

Mr. Tyler Smith
Veyance Technologies, Inc.
1115 S. Wayne St.
St. Marys, OH 45885

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
Veyance Technologies, Inc.

Facility ID:	0306010138
Permit Number:	P0116220
Permit Type:	Renewal
Issued:	8/4/2014
Effective:	8/25/2014
Expiration:	8/25/2019

Division of Air Pollution Control
Title V Permit
for
Veyance Technologies, Inc.

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Authorization

Facility ID:	0306010138
Facility Description:	Manufacturer of Rubber Products
Application Number(s):	A0047985
Permit Number:	P0116220
Permit Description:	Renewal Title V operating permit for a rubber products manufacturing facility.
Permit Type:	Renewal
Issue Date:	8/4/2014
Effective Date:	8/25/2014
Expiration Date:	8/25/2019
Superseded Permit Number:	P0086804

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

Veyance Technologies, Inc.
1115 South Wayne Street
St. Marys, OH 45885-0999

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 Requirements Under 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 Requirements Under 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 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
B008	Boiler #1, 30 mmBtu/hr natural gas fired (PBR10338)
B009	Boiler #2, 30 mmBtu/hr, natural gas fired (PBR10339)
B010	Boiler #3, 30 mmBtu/hr, naturals gas fired (PBR10340)
K024	Maintenance Paint Spray Booth (PTI #03-7960)
K025	Hay Roll Washer/Dryer (PTI #03-7960)
P051	Pyrolysis Oven (PTI #03-3183)
P067	R10-Injection Press (PTI #03-6964)
P070	D54-Injection Press (PTI #03-6964)
P071	Hay Roll Blaster (PTI #03-7960)
T004	Process Oil Tank (PTI #03-6964)
T005	Waste Oil Tank (PTI #03-6964)
P084	Complete Cure Track Press #1 (PTI #P0107843)
P086	Flat Cure Track Press (PTI #03-3105)
P089	Complete Cure Track Press #2 (PTI #P0107843)
P090	Boiler Room Emergency Generator, 308 HP, natural gas fired (PBR10337)

   [OAC rule 3745-77-07(A)(13)]

3. The following emissions unit located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

EU ID	Operations, Property and/or Equipment Description
P090	Boiler Room Emergency Generator, 308 HP, natural gas fired (PBR10337)

   [OAC rule 3745-77-07(A)(13)]

4. The following emission units located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(j):

EU ID	Operations, Property and/or Equipment Description
B008	Boiler #1, 30 mmBtu/hr natural gas fired (PBR10338)
B009	Boiler #2, 30 mmBtu/hr, natural gas fired (PBR10339)
B010	Boiler #3, 30 mmBtu/hr, naturals gas fired (PBR10340)

   [OAC rule 3745-77-07(A)(13)]

5. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart MMMM-Surface Coating of Miscellaneous Metal Parts and Products: K003, K004, K005, K006, K007, K008, K011, K012, K013, K014, K015, K019, K020, K030, and K034. 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.

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

6. 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
B008	Boiler #1, 30.0 mmBtu/hr natural gas fired steam boiler used for process heat
B009	Boiler #2, 30.0 mmBtu/hr natural gas fired steam boiler used for process heat
B010	Boiler #3, 30.0 mmBtu/hr natural gas fired steam boiler 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. 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.

   [OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart DDDDD]

7. The new emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power, and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The new stationary CI RICE, #P090, installed on or after 6/12/06, shall meet the requirements of Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, Part 60, Subpart IIII.

   [40 CFR 63.6585, 40 CFR 63.6590(a), 40 CFR 63.6595, and 40 CFR 63.6590(c)]

C. Emissions Unit Terms and Conditions

1. K020, #2 Spindle Cementer

Operations, Property and/or Equipment Description:

#2 Spindle Cementer

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.	40 CFR 63.3890(b)(4) [from MACT Subpart MMMM – 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) See b)(2)a. – b)(2)d.
b.	40 CFR 63.1-15 (40 CFR 63 Subpart MMMM – Appendix)	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.
c.	OAC rule 3745-31-05(A)(3) (PTI 03-5695 issued October 2, 1991)	202 lbs volatile organic compounds (VOC)/day; 30.9 tons VOC /yr See b)(2)e. and c)(1).
d.	OAC rule 3745-21-09(U)(2)(f)	See b)(2)f.
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in emissions units K003 through K008, K011 through K015, K019, K020, and K034 combined, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in b)(1)a, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(4), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40

CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(6).

b. The permittee must be in compliance with the applicable emission limitation in b)(1)a as specified in the following:

i. The emissions units must be in compliance with the applicable emission limit in b)(1)a at all times except during periods of startup, shutdown, and malfunction.

ii. The emissions units must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(4) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

iii. The emissions units must be in compliance with the work practice standards in c)(6) at all times.

c. The permittee must always operate and maintain the emissions unit, including all air pollution control and monitoring equipment used for purposes of complying with Subpart MMMM, according to the provisions in 40 CFR 63.6(e)(1)(i).

d. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f).

f. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 03-5695, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. (Note: SIP approval pending, for this determination for this emissions unit)

c) Operational Restrictions

(1) Coating usage for this emissions unit shall not exceed 416 gallons/month of primer coat and 520 gallons/month of top coat.

[OAC rule 3745-77-07(A)(1) and PTI 03-5695]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall

maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(4) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:

a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.

b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 345 deg F. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit.

c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to Subpart MMMM (1, 5a, 5b); and OAC 3745-77-07(A)(1)]

(5) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established Permanent Total Enclosure (PTE) status for the capture system(s) employed in emissions units K006, K007, K008, K011, K014, and K020 in accordance with 40 CFR 63.3965(a).

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

(6) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet

an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

[40 CFR 63.3893(b) and OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

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

b. identification of whether the coating is a prime coat or top coat;

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

d. the number of gallons of each coating employed;

e. the total emissions of VOC from each coating employed [d)(1)c x d)(1)d], in pounds;

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

g. the total number of gallons of top coats employed [summation of d)(1)d for all top coats]; and

h. the total number of gallons of prime coats employed [summation of d)(1)d for all prime coats].

[OAC rule 3745-77-07(C)(1) and PTI 03-5695]

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

a. the number of gallons of all the top coatings employed [summation of d)(1)g, for the calendar month];

b. the number of gallons of all the prime coatings employed [summation of d)(1)h, for the calendar month];

c. the total VOC emissions for all the coating materials employed, in pounds [summation of d)(1)f, for the calendar month]; and

d. the annual year-to-date VOC emissions, in tons, from all the cleanup materials employed [summation of d)(2)c, for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI 03-5695]

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

63.3968(a)(1) through (6)	operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
63.3968(a)(7)	definition of monitoring malfunction
63.3968(b)	capture system bypass line monitoring
63.3968(c)	thermal oxidizer monitor specifications
63.3968(f)	gas concentrator specifications
63.3968(g)	PTE capture system monitoring (also Subpart MMMM Table 1 Section 6)
63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63;3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3930(k)(1)	deviation records for add-on controls
63.3930(k)(2)	startup, shutdown, and malfunction records
63.3930(k)(3)	operating limit continuous compliance records
63.3930(k)(4)	Permanent Total Enclosure (PTE) criteria determination documentation
63.3930(k)(6) and (7)	control device performance test records
63.3930(k)(8)	work practice plan records
63.3931	records retention (general)

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

(4) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. 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 OAC rule 3747-17-11(C)]

(5) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(6) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(7) 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 OAC rule 3747-17-11(C)]

(8) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions unit was in operation or not operated in accordance with its established procedures. 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 OAC rule 3747-17-11(C)]

e) ReportingRequirements

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

a. all exceedances of the daily VOC emission limitation of 202 pounds;

b. all exceedances of the monthly gallon usage restrictions of 416 and 520 (for primer coatings and top coats, respectively); and

c. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions unit was in operation.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-5695]

(2) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from coating operations. 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 03-5695]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart MMMM, including the following sections:

63.3920(a)(2)	semi-annual reports (as in Part I - General Terms and Conditions)
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (7)	deviation reporting requirements (general)
63.3920(b)	performance test reports
63.3920(c)	startup, shutdown, malfunction reports

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method:

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

202 lbs VOC/day, 30.9 tons VOC /yr

<u>Applicable Compliance Method</u>:

Compliance shall be based upon the record keeping requirements specified in d)(1) and d)(2), respectively.

[OAC rule 3745-77-07(C)(1) and PTI 03-5695]

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

37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in d)(3).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

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

g) Miscellaneous Requirements

(1) None.

2. K030, #3 Paint Spray Booth-West

Operations, Property and/or Equipment Description:

Binks Spray Booth, Booth #3

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.	40 CFR 63.3890(b)(1) [from MACT Subpart MMMM - 40 CFR 63.3880 et seq.]	2.6 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) See b)(2)a and b)(2)b.
b.	40 CFR 63.1-15 (40 CFR 63 Subpart MMMM – Appendix)	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.
c.	OAC rule 3745-21-09 (U)(1)	Exempt, pursuant to OAC rule 3745-21-09 (U)(2)(e)(iii). See b)(2)c.
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
e.	OAC rule 3745-31-05(A)(3) (PTI 03-2106 issued June 26, 1985)	None. [See b)(2)d.]

(2) Additional Terms and Conditions

a. The permittee shall:

i. Demonstrate that the organic HAP content of each coating used in this emissions unit is less than or equal to the applicable emission limit in b)(1)a, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942, to demonstrate compliance with the applicable emission limit using this option; or

ii. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in this emissions unit, the organic HAP

emission rate is less than or equal to the applicable emission limit in b)(1)a, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

b. This emissions unit, under the compliant material option or the emission rate without add-on controls option as specified above, must be in compliance with the applicable emission limit in b)(1)a at all times.

c. The permittee shall not employ more than ten gallons of coating material per day for the coating of miscellaneous metal parts in this emissions unit.

d. No specific Best Available Technology (BAT) requirements or emission limitations were established in this Permit to Install for this emissions unit.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

d) Monitoring and/or RecordkeepingRequirements

(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; and

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

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

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

63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63.3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3931	records retention (general)

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

(3) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. 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 OAC rule 3747-17-11(C)]

(4) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(5) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(6) 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 OAC rule 3747-17-11(C)]

(7) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions unit was in operation or

not operated in accordance with its established procedures. 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 OAC rule 3747-17-11(C)]

e) ReportingRequirements

(1) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

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

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart MMMM, including the following sections:

63.3920(a)(2)	semi-annual reports (as in Part I - General Terms and Conditions)
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (5), and (6)	deviation reporting requirements (general)

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

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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

f) Testing Requirements

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

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

Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method:

Compliance with the coating usage restriction shall be based upon the recordkeeping requirements specified in d)(1)c.

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

b. Emission Limitation:

2.6 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in d)(2).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

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

g) Miscellaneous Requirements

(1) None.

3. K034, #7 Cementer Spray Booth

Operations, Property and/or Equipment Description:

#7 Cementer Spray Booth (with electric drying oven) - primer and cover adhesives - rubber-to-metal - metal parts - to oxidizer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR, Part 63, Subpart MMMM (40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3890(b)(1) and 63.3882(c), this emissions unit is (part of) an existing general use coating affected source subject to the emissions limitations and/or control measures specified in this section.]	37.7 lb organic Hazardous Air Pollutants (HAP) emissions per gallon of coating solids used during each 12-month rolling compliance period [40 CFR 63.3890(b)(4)] See b)(2)a. - b)(2)d.
b.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart MMMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC 3745-21-09(B)(6)	See b)(2)e.
d.	ORC 3704.03(T) (PTI #P0117220, issued 7/16/14)	See b)(2)f.
e.	OAC rule 3745-17-11(C)	See c)(4) and c)(5).

(2) Additional Terms and Conditions

a. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in emissions units K003 through K008, K011 through K015, K019, K020, and K034, combined, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in b)(1)a, calculated as a rolling 12-month emission rate

and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(1), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(3). The permittee must meet all the requirements of f)(3) to demonstrate compliance with the emission limits, operating limits, and work practice standards.

b. The permittee must be in compliance with the applicable emission limitation in b)(1)a as specified in the following:

i. The emissions unit must be in compliance with the applicable emission limitation in b)(1)a at all times except during periods of startup, shutdown, and malfunction.

ii. The emissions unit must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(1) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

iii. The emissions units must be in compliance with the work practice standards in c)(3) at all times.

c. The permittee must always operate and maintain the emissions unit, including all air pollution control and monitoring equipment used for purposes of complying with 40 CFR, Part 63, Subpart MMMM, according to the provisions in 40 CFR 63.6(e)(1)(i).

d. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

e. In lieu of complying with the pounds of VOC per gallon of solids limitations contained in OAC 3745-21-09(U)(1)(d), the permittee may choose to demonstrate that the capture and control equipment provide not less than an 81% reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than 90% , by weight, for the VOC emissions.

f. In accordance with ORC 3704.03(T), Best Available Technology (BAT) has been determined to be compliance with 40 CFR 63.3880 et seq. (MACT Subpart MMMM).

g. The Potential to Emit for this emissions unit is 5.14 tons volatile organic compounds (VOC) per year and isbased on a maximum VOC content of 6.14 pounds per gallon and a maximum usage rate of 0.51 gallon per hour (primer) and a maximum VOC content of 6.32 pounds per gallon and a maximum usage rate of 1.36 gallon per hour (adhesive). It is further based on a maximum operating schedule of 8760 hours per year, a Permanent Total Enclosure with 100 percent capture [see c)(2)], and a minimum of 90 percent control /reduction efficiency from OAC 3745-21-09(B)(6).

Clean-up operations entail solvent being used in enclosed cleaning /flushing system(s), with solvent reclaimed and/or employed in a 'downgraded use' (and accounted for) as thinner in the other adhesive unit(s). A small amount is sprayed with each cleaning, with emissions sent to the oxidizer. Potential additional VOC emissions are therefore negligible.

c) Operational Restrictions

(1) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:

a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.

b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 345 deg F. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit.

c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[OAC rule 3745-77-07(A)(1), 40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to 40 CFR 63 Subpart MMMM (1, 5a, 5b)]

(2) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established Permanent Total Enclosure (PTE) status for the capture system(s) employed in emissions units K006, K007, K008, K011, K014, K020, and K031, in accordance with 40 CFR 63.3965(a).

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

(3) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

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

(4) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(5) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

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

63.3968(a)(1) through (6)	operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
63.3968(a)(7)	definition of monitoring malfunction
63.3968(b)	capture system bypass line monitoring
63.3968(c)	thermal oxidizer monitor specifications
63.3968(f)	gas concentrator specifications
63.3968(g)	Permanent Total Enclosure (PTE) capture system monitoring (see Table 1 Section 6)
63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63;3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3930(k)(1)	deviation records for add-on controls
63.3930(k)(2)	startup, shutdown, and malfunction records
63.3930(k)(3)	operating limit continuous compliance records
63.3930(k)(4)	PTE criteria determination documentation
63.3930(k)(6) and (7)	control device performance test records
63.3930(k)(8)	work practice plan records
63.3991	records retention (general)

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

(2) The 40 CFR, Part 63, Subpart MMMM air pollution control system performance monitoring and record-keeping requirements of d)(1) are at least as stringent as, and shall be sufficient to satisfy, the monitoring and record-keeping requirements otherwise required under OAC 3745-21-09(B)(3)(l).

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

(3) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. 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 OAC rule 3747-17-11(C)]

(4) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(5) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(6) 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 OAC rule 3745-17-11(C)]

(7) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions unit was in operation or not operated in accordance with its established procedures. 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 OAC rule 3747-17-11(C)]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR, Part 63, Subpart MMMM, including the following sections:

63.3920(a)(2)	semi-annual reports [See e)(2).]
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (7)	deviation reporting requirements (general)
63.3920(b)	performance test reports
63.3920(c)	startup, shutdown, malfunction reports

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

(2) The 40 CFR, Part 63, Subpart MMMM organic HAP air pollution control system performance reporting requirements of e)(1) are at least as stringent as, and shall be sufficient to satisfy, the reporting requirements otherwise required under OAC 3745-21-09(B)(3)(m), except that the reports must be submitted on a quarterly basis as required under OAC 3745-21-09(B)(3)(m) in accordance with Section A.4 of the Standard terms and Condition of this permit.

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

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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

f) Testing Requirements

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

a. The emission testing shall be conducted within six months of permit issuance.

b. The emission testing shall be conducted to demonstrate compliance/fulfill the requirements of 40 CFR, Part 63, Subpart MMMM (for 'organic HAP') and OAC 3745-21-09(B)(6) (for VOC).

c. The following test method(s) shall be employed to meet the testing requirements above: method(s) and procedure(s), as applicable, from 40 CFR 63.3961 and OAC 3745-21-10.

d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Northwest District Office. MSOR

is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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

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

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

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

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

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

37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

<u>Applicable Compliance Method:</u>

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

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

b. Emission Limitation:

Control equipment efficiency of not less than 90%, by weight, for VOC

Applicable Compliance Method:

Compliance shall be determined by emission tests performed in accordance with the methods and procedures specified in section f)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0117220]

(3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR, Part 63, Subpart MMMM, including the following sections:

63.3960, 3961, and 3963	compliance requirements for the emission rate with add-on controls option

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

g) Miscellaneous Requirements

(1) None.

4. P001, Rust Inhibitor Dip Tank

Operations, Property and/or Equipment Description:

Rust Inhibitor Dip 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)(1)(c)	3.5 pounds volatile organic compound (VOC) per gallon of coating, excluding water and exempt solvents [See b)(2)a.]

(2) Additional Terms and Conditions

a. The permittee adds organic materials to the dip tank under the following scenarios:

i. during the day, only compliant materials are added; or

ii. during the day, materials are added which include noncompliant materials.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under d) of this permit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For any day(s) where the scenario in b)(2)a.i. is employed, the permittee shall collect and record the following information each month for the dip tank and shall maintain this information at the facility for a period of three years:

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

a. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating added to the dip tank,calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.

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

(2) On the days when a noncompliant material is added to the dip tank, the permittee shall record the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents.

This shall be determined by collecting a post-material-addition grab sample from the (well-mixed) dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section f)(2)a this permit.

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

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any records from section d) and any accompanying analyses from section f) showing the use of noncomplying coating materials (i.e., for VOC content) in the dip tank. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

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

f) Testing Requirements

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

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

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (including daily volume-weighted average)

<u>Applicable Compliance Method:</u>

Compliance shall be based upon the record keeping requirements specified in section d) and f)(2) of this permit.

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

(2) Determining VOC contents of the coating materials:

a. Any determination of VOC content, solids content, or density of a coating material added to the paint tank shall be based on the coating material, as received, including the use of any thinning or viscosity reducer. The permittee

shall determine the composition of the coating materials by formulation data supplied by the manufacturer of the material or from data determined by an analysis of each coating material, as received, by Reference Method 24 of 40 CFR, Part 60, Appendix A. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine the VOC contents of the coating materials by Reference Method 24 or an equivalent or USEPA-approved alternative method.

b. For the VOC contents of the samples taken from the dip tank pursuant to d)(2), the permittee shall determine the composition of the coatings through the use of USEPA Method 24 of 40 CFR, Part 60, Appendix A, and, if the permittee elects, an equivalent or USEPA-approved alternative method to confirm the Method 24 test result.

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

g) Miscellaneous Requirements:

(1) None.

5. P021, Tumblaster #1

Operations, Property and/or Equipment Description:

"Tumblaster" #1 abrasive blaster - with baghouse

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 3745-17-11(B)	16.7 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);

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

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

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

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

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

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:

16.7 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the maximum volumetric air flow rate (6500 acfm), and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) None.

6. P034, Empty Bag Collector

Operations, Property and/or Equipment Description:

Empty Bag Collector (with cyclone)

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 3745-17-11(B)	4.36 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-31-05 (A)(3) (PTI 03-2106 issued June 26, 1985)	See b)(2)a.

(2) Additional Terms and Conditions

a. No specific Best Available Technology (BAT) requirements or emission limitations were established in this Permit to Install for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

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

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

e) Reporting Requirements

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

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

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

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

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

f) Testing Requirements

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

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

4.36 lb PE /hr

<u>Applicable Compliance Method</u>:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [conservatively estimated] of 10 lbs PE/100 lbs

of solid materials remaining in bags by the maximum amount of solids remaining in bags (200 lbs/hr), and then multiplying by a control factor of (1 - 0.90).*

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

* The control efficiency of the cyclone is assumed to be 90%.

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements:

None.

7. P080, Banbury Bagging and Chemical Weighup

Operations, Property and/or Equipment Description:

Banbury Chemical Bagging and Weighing Area (with baghouse)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI 03-8008 issued June 30, 1994)	0.24 lb particulate emissions (PE)/hr; 1.05 ton PE/yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).

Best available technology (BAT) has been determined to be the use of a baghouse to control all the PE from this emissions unit.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);

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

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

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

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

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

f) Testing Requirements

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

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

0.24 lb PE/hr, 1.05 TPY PE (for this emissions unit)

<u>Applicable Compliance Method</u>:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.0009 lb PE/lb rubber by the maximum raw material usage rate (2000 lbs/hr), and then multiplying by a control factor of (1 - 0.99).*

* The control efficiency of the baghouse is assumed to be 99%.

Compliance with this emission limitation (in conjunction with emissions unit P066) was demonstrated with the results of emissions testing conducted on April 10, 2008.

If required, the permittee shall conduct any future compliance demonstration with the emission limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI 03-8008]

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-8008]

g) Miscellaneous Requirements:

(1) None.

8. Emissions Unit Group-A: P022, P023, P025, P026, and P028

EU ID	Operations, Property and/or Equipment Description
P022	abrasive blaster with 2 baghouses in series
P023	abrasive blaster with 2 baghouses in series
P025	abrasive blaster with 2 baghouses in series
P026	shot peening machine with 2 baghouses in series
P028	shot peening machine with 2 baghouses in series

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 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	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. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and

operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

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

e) Reporting Requirements

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

a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);

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

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

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

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

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

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:

67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group - Mixer Group: P005, P017, P083, and P088

EU ID	Operations, Property and/or Equipment Description
P005	Banbury Mixer 2 - rubber compounds, including ethanol couplers
P017	Banbury Mixer 1 - rubber compounds, including ethanol couplers
P083	Banbury Mixer 4 - rubber compounds, including ethanol couplers
P088	Banbury Mixer 3N - rubber compounds, including ethanol couplers

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

(1) d)(3) through d)(6), and e)(1)c.

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 P0104797 issued June 23, 2009)	91.6 lb organic compounds (OC) /hr (each emissions unit) 0.020 gr particulate matter 10 microns or less (PM_{10}) /scf; 9.0 tons PM_{10}/yr (each emissions unit)] Visible particulate emissions (PE) shall not exceed 5% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI P0104797 issued June 23, 2009)	46.0 tons organic compounds (OC) per rolling 12-month period, for emissions units P005, P017, P083, and P088, combined. See b)(2)c.
c.	OAC rule 3745-17-11 (B)	See b)(2)d.
d.	OAC rule 3745-17-07 (A)	See b)(2)d.
e.	ORC 3704.03(F)(4)(c) OAC rule 3745-114-01	See d)(3) through d)(6), and e)(2)

(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit). BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

This permit for this air contaminant source(s) takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology requirements under OAC rule 3745-31-05(A)(3)(a) while establishing legally and practically enforceable restrictions representing the potential to emit for PM_{10} from each baghouse stack:

i. use of a baghouse(s) achieving a maximum outlet concentration of 0.020 gr PM_{10}/dscf for controlling particulate matter; and

ii. a visible emission limitation associated with the maximum outlet concentration of the baghouse(s) that visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a six-minute average.

All emissions of particulate matter from the baghouse are PM_{10}.

b. The hourly OC emission limitation represents the potential to emit for each emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c. Annual OC emissions shall not exceed 46.0 tons per rolling 12-month period from emissions units P005, P017, P083, and P088, combined. The emission limitation is based on a material throughput restrictions [see c)(1)] for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability an OC limitation effectively restricts volatile organic compounds emissions.

d. The emission limitation specified by this rule is less stringent than the voluntary emission limitation established in this permit.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of rubber compound throughput for emissions units P005, P017, P083, and P088 combined, is limited by the following equation:

$$\sum_{M=1}^{12}\left\{WC_n(MP_n)MA_n(CA_n)\left(\frac{46}{MW_n}\right)+[PT_n(EF_n)]\right\}\left(\frac{1\ ton}{2000\ lbs}\right)\leq 46.0$$

where:

M = the increment of the rolling 12-month period;

n = individual productive* rubber compounds processed during the period;

WC_n = amount of ethanol generating coupler in individual rubber compound n, in pounds;

MP_n = potential moles of ethanol per mole of coupler used;

MA_n = mixing activity factor- moles ethanol emitted/potential moles ethanol from coupler used;

CA_n = coupler activity factor – emission adjustment factor based on fraction of active component in coupler used to make compound 'n';

$(46/MW_n)$ = molecular weight of ethanol is 46 lb/lb mole and MW_n is the molecular weight of the coupler used in compound 'n', in lb/lb mole;

PT_n = amount of individual rubber compound (productive) n processed, in pounds;

EF_n = organic compound emission factor for individual rubber compound n, in lb/lb rubber

*productive represents rubber compound material that has completed all designed material additions and has completed the last designed pass through the mixer.

[OAC rule 3745-77-07(A)(1) and PTI P0104797]

(2) An existing rolling limit of 46.0 tons OC per rolling, 365-day period was established in Permit to Install (PTI) P0104794, issued on June 23, 2009. As such, rolling OC emission records exist for the existing emissions units. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0104797]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions units P005, P017, P083, and P088, combined:

a. name and identification for each productive rubber compound mixed;

b. the amount of each productive rubber compound mixed, in pounds;

c. the calculated OC emissions from each productive rubber compound mixed, in tons, using the following equation:

$E_n = \sum \{[WC_n (MP_n) MA_n (CA_n) (46/MW_n)] + [PT_n (EF_n)]\}$ (1 ton /2000 lbs)

Where,

E_n = OC emissions from each individual productive rubber compound mixed, in tons;

All other variables are the same as described in c)(1);

d. the total OC emission rate from all individual rubber compounds mixed, in tons/month, calculated as follows:

$E_M = (E_1 + E_2 + E_3 +... +E_n)$

where:

E_M = Monthly OC emissions, in tons/month; and

E_n = OC from individual productive rubber compounds mixed, in tons;

e. the rolling, 12-month total OC emission rate calculated as follows:

$E_T = (E_{M1} + E_{M2} + E_{M3} +... +E_{M12})$

where:

E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions;

E_M = Monthly OC emissions from all individual productive rubber compounds mixed (tons/month).\

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

(2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse(s) is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse(s) is 0.5 to 4.0 inches of water (for emissions units P005 and P088).

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags / filters.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained from the equipment vendor or during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

(3) The PTI application for this emissions unit group was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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: hydroquinone
TLV (mg/m3): 2
Maximum Hourly Emission Rate: 1.47 lbs/hr (increase)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.1
MAGLC (ug/m3): 47.6

The permittee has demonstrated that emissions of hydroquinone from this emissions unit group 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 P0104797]

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

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

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

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

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final 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 P0104797]

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

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

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

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

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

[PTI P0104797]

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

[PTI P0104797]

e) Reporting Requirements

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

a. any exceedances of the rolling 12-month OC limitation specified in b)(1)b;

b. any exceedances of the maximum allowable cumulative productive rubber compound throughput for the first 12 months of operation as specified in c)(2);

c. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect;

d. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);

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

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

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

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 P0104797]

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:

91.6 lb OC /hr (each emissions unit)

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established based on the equation in c)(1) and the following values representing a "worst-case' maximum scenario:

WC = 600 lbs coupler, maximum;

MP = 4 potential moles ethanol from coupler, worst-case (current) coupler;

MA = 0.75 moles ethanol emitted / potential moles ethanol from coupler, maximum;

CA = 0.5 coupler activity fraction, typical worst-case

MW = 474 coupler molecular weight, typical worst-case

PT = 22,500 total mixed compound, pounds per hour maximum;

RMA = 0.000194 OC emission factor, lb OC per lb Compound #5, typical worst-case [RMA emission factor information also in AP-42 (Draft) Section 4.12]

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 1 through 4 and 18, 25, 25a, as appropriate, of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

b. Emission Limitation:

46.0 tons organic compounds (OC) per rolling 12-month period, for emissions units P005, P017, P083, and P088, combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

c. Emission Limitation:

0.020 gr PM_{10} /scf

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

d. Emission Limitation:

9.0 tons PM_{10}/yr (each emissions unit)

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum baghouse(s) outlet concentration of 0.020 gr/scf by the baghouse(s) maximum combined volumetric air flow rate (12,000 acfm), then multiplying by lb/7000 grains and 60 minutes/hour, then multiplying by 8760 hr/yr and ton/2000lb.

If required, the permittee shall demonstrate compliance with the hourly emission limitation as indicated in c. above.

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

e. Emission Limitation:

Visible PE shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI P0104797]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Variance - Dip Tank/Roll Coat: K006, K007, and K019

EU ID	Operations, Property and/or Equipment Description
K006	#6 cementer (adhesives) - rubber and metal - dip tank - with (optional) thermal oxidizer
K007	#7 cementer (adhesives) - rubber and metal - dip tank - with (optional) thermal oxidizer
K019	#1 and #2 pin cementers (adhesives) - rubber and metal - roll coat application

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.	40 CFR 52.1870(c)(84) (54 FR 32637) (variance)	255 tons volatile organic compounds (VOC)/year [for emissions units K003 thru K008, K011 thru K015, and K019, combined - See b)(2)a.]
b.	40 CFR 63.3890(b)(4) [from MACT Subpart MMMM - 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) See b)(2)b. – b)(2)e.
c.	40 CFR 63.1-15 (40 CFR 63 Subpart MMMM – Appendix)	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. This emissions unit does not have to comply with the requirements of OAC rule 3745-21-09 (U) because of the variance. In lieu of the requirements of OAC rule 3745-21-09 (U), the permittee shall limit the total VOC emissions from emissions units K003 through K008, K011 through K015, and K019, combined, to 255 tons/year.

b. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in emissions units K003 through K008, K011 through K015, K019, K020, and K034 combined, and the emissions reductions achieved by emission capture systems and add-on controls, the

organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in Section b)(1)b above, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(1), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(3).

c. The permittee must be in compliance with the applicable emission limitation in Section b)(1)b as specified in the following:

i. The emissions units must be in compliance with the applicable emission limit in b)(1)b at all times except during periods of startup, shutdown, and malfunction.

ii. The emissions units must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(1) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

iii. The emissions units must be in compliance with the work practice standards in c)(3) at all times.

d. The permittee must always operate and maintain the emissions units, including all air pollution control and monitoring equipment used for purposes of complying with Subpart MMMM, according to the provisions in 40 CFR 63.6(e)(1)(i).

e. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

c) Operational Restrictions

(1) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:

a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.

b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 345 deg F. The average gas temperature of

the desorption concentrate stream in any 3-hour period must not fall below the limit.

c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to Subpart MMMM (1, 5a, 5b); and OAC 3745-77-07(A)(1)]

(2) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established Permanent Total Enclosure (PTE) status for the capture system(s) employed in emissions units K006, K007, K008, K011, K014, and K020 in accordance with 40 CFR 63.3965(a).

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

(3) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

[40 CFR 63.3893(b) and OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall calculate and record the following information each quarter for emissions units K003 through K008, K011 through K015, and K019, combined:

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

b. the VOC content of each adhesive employed, in pounds/gallon;

c. the number of gallons of each adhesive employed;

d. the total emissions of VOC from each adhesive employed [d)(1)b x d)(1)c], in pounds;

e. the total emissions of VOC from all the adhesives employed [summation of d)(1)d for all adhesives), in pounds;

f. the total pounds of the adhesive waste sent off site;

g. the VOC content of the adhesive waste sent off site, in %, by weight;

h. the total pounds of VOC sent off site [d)(1)f x d)(1)g], in pounds; and

i. the total emissions of VOC for all the adhesives {[d)(1)e – d)(1)h]/2000}, in tons.

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

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

63.3968(a)(1) through (6)	operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
63.3968(a)(7)	definition of monitoring malfunction
63.3968(b)	capture system bypass line monitoring
63.3968(c)	thermal oxidizer monitor specifications
63.3968(f)	gas concentrator specifications
63.3968(g)	PTE capture system monitoring (also Subpart MMMM Table 1 Section 6)
63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63;3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3930(k)(1)	deviation records for add-on controls
63.3930(k)(2)	startup, shutdown, and malfunction records
63.3930(k)(3)	operating limit continuous compliance records
63.3930(k)(4)	Permanent Total Enclosure (PTE) criteria determination

	documentation
63.3930(k)(6) and (7)	control device performance test records
63.3930(k)(8)	work practice plan records
63.3931	records retention (general)

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a summary of the total VOC emissions for emissions units K003 through K008, K011 through K015, and K019, combined, for the previous calendar quarter. These reports shall be submitted by April 30, July 31, October 31 and January 31 of each year.

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

(2) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a description of the progress made during the previous calendar quarter concerning the replacement of the solvent-based adhesives with high-solids and/or water-based adhesives. The reports shall include the following information:

a. a description of the research and development work performed, including the factory trials conducted, the progress achieved and the problems encountered; and

b. data and/or logs which confirm the research and trials described in paragraph a.

These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.

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

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart MMMM, including the following sections:

63.3920(a)(2)	semi-annual reports (as in Part A - Standard Terms and Conditions)
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (7)	deviation reporting requirements (general)
63.3920(b)	performance test reports
63.3920(c)	startup, shutdown, malfunction reports

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

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:

255 tons VOC/year (for emissions units K003 thru K008, K011 thru K015 and K019, combined)

Applicable compliance method:

The record keeping requirements established in c)(1) shall be used to demonstrate compliance with the annual allowable VOC emission limitation.

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

b. Emission Limitation:

37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in d)(2).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

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

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Variance - Spray Coating: K003, K004, K005, K008, K011, K012, K013, K014, and K015

EU ID	Operations, Property and/or Equipment Description
K003	#3 cementer (adhesives) - rubber and metal - manual spray application - with filters
K004	#4 cementer (adhesives) - rubber and metal - automated spray application - with filters
K005	#5 cementer (adhesives) - rubber and metal - manual spray application - with filters
K008	#1 spindle cementer (adhesives) - rubber and metal - conveyorized automated spray - with filters - with (optional) thermal oxidizer
K011	#11 cementer (adhesives) - rubber and metal - conveyorized automated spray - with filters - with (optional) thermal oxidizer
K012	#12 cementer (adhesives) - rubber and metal - manual spray application - with filters
K013	#13 cementer (adhesives) - rubber and metal - manual spray application - with filters
K014	#14 cementer (adhesives) - rubber and metal - conveyorized automated spray - with filters - with (optional) thermal oxidizer
K015	#15 table cementer (adhesives) - rubber and metal - manual spray application - with filters

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

(1) None.

b) ApplicableEmissionsLimitations 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.	40 CFR 52.1870(c)(84) (54 FR 32637) (variance)	255 tons volatile organic compounds (VOC)/year [for emissions units K003 thru K008, K011 thru K015, and K019, combined - See b)(2)a.]
b.	40 CFR 63.3890(b)(4) [from MACT Subpart MMMM - 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) See b)(2)b. – b)(2)e.
c.	40 CFR 63.1-15 (40 CFR 63 Subpart MMMM – Appendix)	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.
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).

(2) Additional Terms and Conditions

a. This emissions unit does not have to comply with the requirements of OAC rule 3745-21-09 (U) because of the variance. In lieu of the requirements of OAC rule 3745-21-09 (U), the permittee shall limit the total VOC emissions from emissions units K003 through K008, K011 through K015, and K019, combined, to 255 tons/year.

b. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaningmaterials used in emissions units K003 through K008, K011 through K015, K019, K020, and K034 combined, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in Section b)(1)b above, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(3), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(5).

c. The permittee must be in compliance with the applicable emission limitation in Section b)(1)b as specified in the following:

i. The emissions units must be in compliance with the applicable emission limit in b)(1)b at all times except during periods of startup, shutdown, and malfunction.

ii. The emissions units must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(3) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

iii. The emissions units must be in compliance with the work practice standards in c)(5) at all times.

d. The permittee must always operate and maintain the emissions units, including all air pollution control and monitoring equipment used for purposes of complying with Subpart MMMM, according to the provisions in 40 CFR 63.6(e)(1)(i).

e. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of these emissions unitsare in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:

a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.

b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 345 deg F. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit.

c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to Subpart MMMM (1, 5a, 5b); and OAC 3745-77-07(A)(1)]

(4) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established Permanent Total Enclosure (PTE) status for the capture system(s) employed in emissions units K006, K007, K008, K011, K014, and K020 in accordance with 40 CFR 63.3965(a).

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

(5) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

[40 CFR 63.3893(b) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall calculate and record the following information each quarter for emissions units K003 through K008, K011 through K015, and K019, combined:

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

b. the VOC content of each adhesive employed, in pounds/gallon;

c. the number of gallons of each adhesive employed;

d. the total emissions of VOC from each adhesive employed [d)(1)b x d)(1)c], in pounds;

e. the total emissions of VOC from all the adhesives employed [summation of d)(1)d for all adhesives), in pounds;

f. the total pounds of the adhesive waste sent off site;

g. the VOC content of the adhesive waste sent off site, in %, by weight;

h. the total pounds of VOC sent off site [d)(1)f x d)(1)g], in pounds; and

i. the total emissions of VOC for all the adhesives {[d)(1)e – d)(1)h]/2000}, in tons.

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

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

63.3968(a)(1) through (6)	operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
63.3968(a)(7)	definition of monitoring malfunction
63.3968(b)	capture system bypass line monitoring
63.3968(c)	thermal oxidizer monitor specifications
63.3968(f)	gas concentrator specifications
63.3968(g)	PTE capture system monitoring (also Subpart MMMM Table 1 Section 6)
63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63.3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3930(k)(1)	deviation records for add-on controls
63.3930(k)(2)	startup, shutdown, and malfunction records
63.3930(k)(3)	operating limit continuous compliance records
63.3930(k)(4)	PTE criteria determination documentation
63.3930(k)(6) and (7)	control device performance test records
63.3930(k)(8)	work practice plan records
63.3931	records retention (general)

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

(3) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. 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 OAC rule 3747-17-11(C)]

(4) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(5) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[OAC rule 3745-77-07(C)(1) and OAC rule 3747-17-11(C)]

(6) 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 OAC rule 3747-17-11(C)]

(7) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emission units were in operation or not operated in accordance with its established procedures. 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 OAC rule 3747-17-11(C)]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a summary of the total VOC emissions for emissions units K003 through K008, K011 through K015, and K019, combined, for the previous calendar quarter. These reports shall be submitted by April 30, July 31, October 31 and January 31 of each year.

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

(2) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a description of the progress made during the previous calendar quarter concerning the replacement of the solvent-based adhesives with high-solids and/or water-based adhesives. The reports shall include the following information:

a. a description of the research and development work performed, including the factory trials conducted, the progress achieved and the problems encountered; and

b. data and/or logs which confirm the research and trials described in paragraph a.

These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.

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

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart MMMM, including the following sections:

63.3920(a)(2)	semi-annual reports (as in Part A - Standard Terms and Conditions)
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (7)	deviation reporting requirements (general)
63.3920(b)	performance test reports
63.3920(c)	startup, shutdown, malfunction reports

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

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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

f) Testing Requirements

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

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

255 tons VOC/year (for emissions units K003 thru K008, K011 thru K015 and K019, combined)

<u>Applicable compliance method:</u>

The record keeping requirements established in c)(1) shall be used to demonstrate compliance with the annual allowable VOC emission limitation.

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

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

37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in d)(2).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

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

g) Miscellaneous Requirements

(1) None.