



8/20/2014

Certified Mail

NICK PAMBOUKIS  
Heritage Fireplace Equipment Co.  
1874 Englewood Avenue  
Akron, OH 44312

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1677010272  
Permit Number: P0115718  
Permit Type: Renewal  
County: Summit

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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 PTIO 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](http://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](http://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](http://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, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Heritage Fireplace Equipment Co.**

Facility ID:	1677010272
Permit Number:	P0115718
Permit Type:	Renewal
Issued:	8/20/2014
Effective:	8/20/2014
Expiration:	8/20/2019





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Heritage Fireplace Equipment Co.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	12
1. K005, Three Gallon Booth.....	13
2. K008, Smitty Line.....	19
3. Emissions Unit Group - Cleveland Line & Floor Booth: K009, K010 .....	27
4. Emissions Unit Group - Heritage Line: K006, K007 .....	35
5. Emissions Unit Group - J Line: K011, K012 .....	43





**Final Permit-to-Install and Operate**  
Heritage Fireplace Equipment Co.  
**Permit Number:** P0115718  
**Facility ID:** 1677010272  
**Effective Date:** 8/20/2014

## Authorization

Facility ID: 1677010272  
Application Number(s): A0049233  
Permit Number: P0115718  
Permit Description: Renewal FEPTIO for eight (8) coating lines coating metal and non-metal parts and assemblies.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 8/20/2014  
Effective Date: 8/20/2014  
Expiration Date: 8/20/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Heritage Fireplace Equipment Co.  
1874 Englewood Ave  
Akron, OH 44312

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

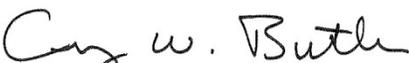
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0115718  
 Permit Description: Renewal FEPTIO for eight (8) coating lines coating metal and non-metal parts and assemblies.

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

**Emissions Unit ID: K005**  
 Company Equipment ID: Three Gallon Booth  
 Superseded Permit Number: P0104818  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: K008**  
 Company Equipment ID: Smitty Line  
 Superseded Permit Number: P0104818  
 General Permit Category and Type: Not Applicable

**Group Name: Cleveland Line & Floor Booth**

<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	Cleveland Line
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Floor Booth
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable

**Group Name: Heritage Line**

<b>Emissions Unit ID:</b>	<b>K006</b>
Company Equipment ID:	Heritage Booth 1
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Heritage Booth 2
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable

**Group Name: J Line**

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	J-Line Booth 1
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	J-Line Booth 2
Superseded Permit Number:	P0104818
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Heritage Fireplace Equipment Co.  
**Permit Number:** P0115718  
**Facility ID:** 1677010272  
**Effective Date:** 8/20/2014

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
Heritage Fireplace Equipment Co.  
**Permit Number:** P0115718  
**Facility ID:** 1677010272  
**Effective Date:** 8/20/2014

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 1.d), 1.e), 1.f), and 1.g).
  - c) The total allowable usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K005 through K012, combined, shall not exceed 9.9 tons per year\*\* for any single HAP and 24.9 tons per year\*\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*\* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
  - d) The permittee shall collect and record the following information each month for emissions units K005 through K012:
    - (1) the name and identification number of each coating employed;
    - (2) the individual HAP\* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
    - (3) the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from d)(2) above];
    - (4) the number of gallons of each coating employed;
    - (5) the name and identification of each cleanup material employed;
    - (6) the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
    - (7) the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from d)(6) above];
    - (8) the number of gallons of each cleanup material employed;
    - (9) the total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of d)(2) times d)(4) for each coating plus the sum of d)(6) times d)(8) for each cleanup material];



- (10) the total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month [the sum of d)(3) times d)(4) for each coating plus the sum of d)(7) times d)(8) for each cleanup material];
- (11) the rolling, 12-month summation of individual HAP usage\*\* for each HAP, in tons\*\*\*; and
- (12) the rolling, 12-month combined HAPs usage\*\*, in tons\*\*\*.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on an individual emissions unit basis.

\*\* This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

\*\*\*This shall include the information for the current month and the preceding eleven calendar months.

- e) The permittee shall submit quarterly deviation (excursion) reports that identify:
- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - a. all exceedance of the rolling, 12-month individual HAP usage limitation for emissions units K005 through K012, combined; and
    - b. all exceedances of the rolling, 12-month combined HAPs usage limitation for emissions units K005 through K012, combined;
  - (2) the probable cause of each deviation (excursion);
  - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - (4) the magnitude and duration of each deviation (excursion).

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

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

- f) The permittee shall also submit annual reports that specify the total individual HAP usage for each HAP and the total combined HAPs usage from emissions units K005 through K012, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.



g) Compliance with the emissions limitation(s) in 1.c) above shall be determined in accordance with the following method(s):

(1) Emission Limitation:

The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K005 through K012, combined, shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual individual HAP and combined HAP usage limitations above shall be demonstrated based on the record keeping requirements established in 1.d) above.



**Final Permit-to-Install and Operate**  
Heritage Fireplace Equipment Co.  
**Permit Number:** P0115718  
**Facility ID:** 1677010272  
**Effective Date:** 8/20/2014

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



**1. K005, Three Gallon Booth**

**Operations, Property and/or Equipment Description:**

Three Gallon Booth - coating of metal and non-metal parts and assemblies

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b.
- 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 16-02292 issued 3/21/2006	Organic compound (OC) emissions shall not exceed 20 pounds per day from this emissions unit.  Volatile organic compound (VOC) emissions shall not exceed 20 pounds per day from coating metal parts.  OC emissions shall not exceed 3.7 tons per year.  VOC emissions shall not exceed 3.7 tons per year.  See b)(2)a. and b)(2)b. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(D).
b.	OAC rule 3745-31-05(D)	See 1.c) of Section B – Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2) below.
d.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(2) below.

(2) Additional Terms and Conditions

- a. The annual OC and VOC emission limitations in b)(1)a. above are based on the emissions unit’s potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The permittee shall not employ more than three gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

d) Monitoring and/or Recordkeeping Requirements

- (1) When coating metal parts, the permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content of each coating employed, as applied, in pounds per gallon;
  - c. the VOC content of each cleanup material employed, in pounds per gallon;
  - d. the volume, in gallons, of each coating employed;
  - e. the total volume, in gallons, of all of the coatings employed;
  - f. the volume, in gallons, of each cleanup material employed; and



- g. the total daily VOC emissions from all coatings, as applied, and cleanup materials, in pounds calculated as below:

Daily VOC emissions = (the sum of d)(1)b. times d)(1)d. for all coatings employed) + (the sum of d)(1)c. times d)(1)f. for all cleanup materials employed).

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

- a. the name and identification of each coating and cleanup material employed;
- b. the OC content of each coating employed, as applied, in pounds per gallon;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the volume, in gallons, of each coating employed;
- e. the volume, in gallons, of each cleanup material employed; and
- f. the total daily OC emissions from all coatings, as applied, and cleanup materials, in pounds calculated as below:

Daily OC emissions = (the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)c. times d)(3)e. for all cleanup materials employed).

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (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.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
  - a. an identification of each day during which the daily OC emissions from the coatings and cleanup materials from this emissions unit exceeded 20 pounds per day, and the actual daily OC emissions for each such day; and
  - b. an identification of each day during which the daily VOC emissions, for coating metal parts, from the coatings and cleanup materials from this emissions unit exceeded 20 pounds per day, and the actual daily VOC emissions for each such day.
  - c. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
- (4) 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 of an 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

OC emissions shall not exceed 20 pounds per day from this emissions unit.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(2) above.

b. Emission Limitation:

VOC emissions shall not exceed 20 pounds per day from coating metal parts.

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

c. Gallons Usage Limitation:

The permittee shall employ no more than three gallons of coatings in any one day when coating metal parts in this emissions unit.

Applicable Compliance Method:

Compliance with the daily gallon usage limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

d. Emission Limitation:

OC emissions shall not exceed 3.7 tons per year.

VOC emissions shall not exceed 3.7 tons per year.



**Final Permit-to-Install and Operate**  
Heritage Fireplace Equipment Co.  
**Permit Number:** P0115718  
**Facility ID:** 1677010272  
**Effective Date:** 8/20/2014

Applicable Compliance Method:

The annual allowable emission limitations above were determined by multiplying the daily allowable emission limitation by 365 days per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the daily allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

(1) None.



**2. K008, Smitty Line**

**Operations, Property and/or Equipment Description:**

Smitty Line (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven

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

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

a. None.

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

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

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 16-02292 issued 3/21/2006	Organic compound (OC) emissions shall not exceed 321.6 pounds per day from this emissions unit when coating non-metal parts.  See b)(2)c. below.  OC emissions shall not exceed 11 tons per year from this emissions unit.  See b)(2)a., b)(2)b. and b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 7 tons per year, based upon a rolling, 12-month



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		summation of the monthly emissions.  See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(c)	VOC emissions shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

(2) Additional Terms and Conditions

- a. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter 10 microns and less in diameter (PM<sub>10</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), organic compounds (OC), and sulfur dioxide (SO<sub>2</sub>) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions.
- b. The daily OC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- c. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

c) Operational Restrictions

- (1) The permittee shall not employ more than 7 tons of VOC per year (VOC input) as a rolling, 12-month summation from coating and cleanup material usage.

The VOC input\* shall be determined by multiplying the number of gallons of coating and cleanup material employed per month by the VOC content of each coating and cleanup material, in pounds per gallon, then dividing by 2,000 pounds per ton (for the annual limit).

\*This assumes that 100% of VOCs in the coating and cleanup material are emitted.

- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.



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

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.



- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification of each coating and cleanup material employed;
  - b. the VOC content of each coating employed, as applied, in pounds per gallon;
  - c. the VOC content of each cleanup material employed, in pounds per gallon;
  - d. the volume of each coating employed, in gallons;
  - e. the volume of each cleanup material employed, in gallons.
  - f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:  
  
monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)c. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and
  - g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:  
  
rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).
- \*This assumes that 100% of the VOCs in the coating and cleanup material are emitted.
- (3) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
- a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
  - d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the



permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 7 tons of VOC per year (VOC input) as a rolling, 12-month summation from coating and cleanup material usage; and
    - ii. 7 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions;



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (6) 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 of an 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

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

a. Emission Limitation:

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

The permittee shall not employ more than 7 tons of VOC per year (VOC input) as a rolling, 12-month summation from coating and cleanup material usage.

The emissions of VOC shall not exceed 7 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

c. Emission Limitation:

OC emissions shall not exceed 321.6 pounds per day from this emissions unit when coating non-metal parts.

Applicable Compliance Method:

The daily allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily coatings usage rate (48 gallons per day) by the maximum OC content of the coating (6.7 pounds per gallon).



d. Emission Limitation:

OC emissions shall not exceed 11 tons per year from this emissions unit.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

(1) None.



**3. Emissions Unit Group - Cleveland Line & Floor Booth: K009, K010**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K009	Cleveland Line (existing) - coating of metal and non-metal parts and assemblies, with batch oven shared with emissions unit K010
K010	Floor Booth (existing) - coating of metal and non-metal parts and assemblies, with batch oven shared with emissions unit K009

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

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

a. None.

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

a. b)(1)b., c)(1), d)(2), e)(2), e)(5), and f)(1)b.

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 16-02292 issued 3/21/2006	Organic compound (OC) emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.  OC emissions shall not exceed 15 tons per year from emissions units K009 and K010, combined.  See b)(2)a., b)(2)b. and b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions shall not exceed 7 tons per year for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions.  See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(c)	The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

(2) Additional Terms and Conditions

- a. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter 10 microns and less in diameter (PM<sub>10</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), organic compounds (OC), and sulfur dioxide (SO<sub>2</sub>) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions.
- b. The daily OC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- c. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

c) Operational Restrictions

- (1) The permittee shall not employ more than 7 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K009 and K010, combined, from coating and cleanup material usage.

The VOC input\* shall be determined by multiplying the number of gallons of coating and cleanup material employed per month by the VOC content of each coating and cleanup material, in pounds per gallon, then dividing by 2,000 pounds per ton (for the annual limit).

\*This assumes that 100% of VOCs in the coating and cleanup material are emitted.

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



particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

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

where:

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

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

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

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

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a permit-to-install, where the above-mentioned information shall be



maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) The permittee shall collect and record the following information each month for emissions units K009 and K010, combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)c. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

- (3) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K009 and K010, combined:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

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



- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (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.

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. 7 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K009 and K010, combined, from coating and cleanup material usage; and
- ii. 7 tons of VOC per year for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K009 and K010, combined, for the previous calendar year. These reports shall be submitted by January 31 or each year.
- (6) 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 of an 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

The permittee shall not employ more than 7 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K009 and K010, combined, from coating and cleanup material usage.

The emissions of VOC shall not exceed 7 tons per year for emissions units K009 and K010, combined, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

c. Emission Limitation:



OC emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.

Applicable Compliance Method:

The daily allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily coatings usage rate (48 gallons per day) by the maximum OC content of the coating (6.7 pounds per gallon).

d. Emission Limitation:

OC emissions shall not exceed 15 tons per year from emissions units K009 and K010, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

- (1) None.



**4. Emissions Unit Group - Heritage Line: K006, K007**

EU ID	Operations, Property and/or Equipment Description
K006	Heritage Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K007
K007	Heritage Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K006

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

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

a. None.

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

a. b)(1)b., c)(1), d)(2), e)(2), e)(5), and f)(1)b.

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 16-02292 issued 3/21/2006	Organic compound (OC) emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.  See b)(2)c. below.  OC emissions shall not exceed 42.3 tons per year from emissions units K006 and K007, combined.  See b)(2)a., b)(2)b. and b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(D).
b.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds (VOC) from emissions units K006 and K007, combined, shall not exceed 28.3 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.</p>
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(c)	The emission of VOC shall not exceed 3.5 pounds of VOC gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

(2) Additional Terms and Conditions

- a. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter 10 microns and less in diameter (PM<sub>10</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), organic compounds (OC), and sulfur dioxide (SO<sub>2</sub>) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions.
- b. The daily OC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- c. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

c) Operational Restrictions

- (1) The permittee shall not employ more than 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage.

The VOC input\* shall be determined by multiplying the number of gallons of coating and cleanup material employed per month by the VOC content of each coating and cleanup material, in pounds per gallon, then dividing by 2,000 pounds per ton (for the annual limit).

\*This assumes that 100% of VOCs in the coating and cleanup material are emitted.



- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

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

where:

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

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

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

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

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

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

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

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

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

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



This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information each month for emissions units K006 and K007, combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)c. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

(3) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K006 and K007, combined:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation



of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (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.

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage; and
  - ii. 28.3 tons of VOC per year for emissions units K006 and K007, combined, based upon a rolling, 12-month summation of the monthly;
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (4) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
- (5) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K006 and K007, combined, for the previous calendar year. These reports shall be submitted by January 31 or each year.
- (6) 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 of an 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A

b. Emission Limitation:

The permittee shall not employ more than 28.3 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions unit K006 and K007, combined, from coating and cleanup material usage.

The emissions of VOC from emissions units K006 and K007, combined, shall not exceed 28.3 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.



c. Emission Limitation:

OC emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.

Applicable Compliance Method:

The daily allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily coatings usage rate (48 gallons per day) by the maximum OC content of the coating (6.7 pounds per gallon).

d. Emission Limitation:

OC emissions shall not exceed 42.3 tons per year from emissions units K006 and K007, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

- (1) None.



**5. Emissions Unit Group - J Line: K011, K012**

EU ID	Operations, Property and/or Equipment Description
K011	J Line Booth 1 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K012
K012	J Line Booth 2 (existing) - coating of metal and non-metal parts and assemblies, with flash-off oven shared with emissions unit K011

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

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

a. None.

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

a. b)(1)b., c)(1), d)(2), e)(2), e)(6) and f)(1)b.

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 16-02292 issued 3/21/2006	Organic compound (OC) emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.  OC emissions shall not exceed 76.8 tons per year from emissions units K011 and K012 combined.  See b)(2)a., b)(2)b. and b)(2)c. below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	The emissions of volatile organic



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		compounds (VOC) shall not exceed 48.8 tons per year for emissions units K011 and K012 combined based upon a rolling, 12-month summation of the monthly emissions.  See 1.c) of Section B – Facility-Wide Terms and Conditions and c)(1) below.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(c)	The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

(2) Additional Terms and Conditions

- a. The potential combustion emissions were estimated by multiplying the maximum BTU rating of the oven used by this coating line by AP-42 chapter 1.4 emission factors. The potential hourly emissions of particulate emissions (PE), particulate matter 10 microns and less in diameter (PM<sub>10</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), organic compounds (OC), and sulfur dioxide (SO<sub>2</sub>) were all within de minimis levels. Therefore, there are no monitoring or record keeping requirements necessary to demonstrate compliance with these emissions.
- b. The daily OC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.
- c. The permittee shall employ properly installed and maintained spray booth exhaust fan panel filter elements while this emission unit is in operation.

c) Operational Restrictions

- (1) The permittee shall not employ more than 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011 and K012 combined from coating and volatile cleanup material usage.

The VOC input\* shall be determined by multiplying the number of gallons of coating and cleanup material employed per month by the VOC content of each coating and cleanup material, in pounds per gallon, then dividing by 2000 pounds per ton (for the annual limit).

\*This assumes that 100% of VOCs in the coating and cleanup material are emitted.



- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) For surface coating of miscellaneous metal parts and products, the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

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

where:

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

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

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

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

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

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

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

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

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

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



This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information each month for emissions units K011 and K012 combined:

- a. the name and identification of each coating and cleanup material employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup material employed, in gallons;
- f. the total monthly VOC emissions and VOC input\* from all coatings, as applied and cleanup materials, in tons calculated as below:

monthly VOC emissions and VOC input\* = [(the sum of d)(3)b. times d)(3)d. for all coatings employed) + (the sum of d)(3)d. times d)(3)e. for all cleanup materials employed)], and then divided by 2000 pounds per ton; and

- g. the rolling, 12-month summation of VOC emissions and VOC input\*, in tons, calculated as below:

rolling, 12-month summation of VOC emissions and VOC input\* = (monthly VOC emissions and VOC input\* from d)(3)f. + sum of monthly VOC emissions and VOC input\* from previous 11 calendar months).

\*This assumes that 100% of the VOC's in the coating and cleanup material are emitted.

(3) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for emissions units K011 and K012 combined:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
- d. the total organic compound emission rate for all coating and cleanup materials, in pounds or tons.

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation



of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (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.

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) **Reporting Requirements**

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly records showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month during which the non-complying coatings were used.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the



potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011 and K012 combined from coating and volatile cleanup material usage; and
  - ii. 48.8 tons of VOC per year for emissions units combined, based upon a rolling, 12-month summation of the monthly emissions;
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall identify in the annual Permit Evaluation Report (PER) report the following information during the 12-month reporting period for this emissions unit:
    - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
  - (4) Annual PERforms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (5) The permittee shall submit annual reports which specify the VOC and OC emissions from emissions units K011 and K012 combined for the previous calendar year. These reports shall be submitted by January 31 or each year.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:



a. Emission Limitation:

The emissions of VOC shall not exceed 3.5 pounds of VOC per gallon of coatings excluding water and exempt solvents, for an extreme performance coating, when coating metal parts.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

The permittee shall not employ more than 48.8 tons of VOC per year (VOC input) as a rolling, 12-month summation for emissions units K011 and K012 combined from coating and volatile cleanup material usage.

The emissions of volatile organic compounds (VOC) shall not exceed 48.8 tons per year for emissions units K011 and K012 combined based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(3) above.

c. Emission Limitation:

OC emissions shall not exceed 321.6 pounds per day from each emissions unit when coating non-metal parts.

Applicable Compliance Method:

The daily allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily coatings usage rate (48 gallons per day) by the maximum OC content of the coating (6.7 pounds per gallon).



d. Emission Limitation:

OC emissions shall not exceed 76.8 tons per year from emissions units K011 and K012 combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(4) above.

g) Miscellaneous Requirements

(1) None.