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

8/22/2014

Certified Mail

Facility ID: 0302000166
Permit Number: P0106946
County: Allen

Kevin Gearig
DTR Industries Incorporated
320 Snider Road
Bluffton, OH 45817

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,

Michael W. Ahern

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

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

FINAL

Division of Air Pollution Control
Title V Permit
for
DTR Industries Incorporated

Facility ID:	0302000166
Permit Number:	P0106946
Permit Type:	Renewal
Issued:	8/22/2014
Effective:	9/12/2014
Expiration:	9/12/2019

Division of Air Pollution Control
Title V Permit
for
DTR Industries Incorporated

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Authorization

Facility ID:	0302000166
Facility Description:	Anti-vibration rubber and automotive hose parts manufacturing facility.
Application Number(s):	A0017377, A0035800, A0039992, A0048094
Permit Number:	P0106946
Permit Description:	Renewal Title V operating permit for an anti-vibration rubber and automotive hose parts manufacturing facility.
Permit Type:	Renewal
Issue Date:	8/22/2014
Effective Date:	9/12/2014
Expiration Date:	9/12/2019
Superseded Permit Number:	P0086612

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

DTR Industries Incorporated
320 Snider Road
Bluffton, OH 45817

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

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

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

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

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

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

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

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

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

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

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

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

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following significant emissions units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products): K004, K006, K009, K013, K016, K017, K018, K019, K023, K026, K030, K031, K032, K033, K035, K036, K041, K043, K045, K050, K051, K052, K053, K055, K057, K058, K059, K060, K062, K063, K064, K065, and K066. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart MMMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart MMMM, and in Subpart A.

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

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

3. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units P037, P038, P062, P063, P064, P065, P067, P068, and P069 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [OAC rule 3745-77-07(A)(13) and 40 CFR Part 64]

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

   a) B001 – 8.5 mmBtu/hr natural gas and #2 oil-fired boiler [U11] (PTI #03-3537);
   b) B002 – 8.5 mmBtu/hr natural gas and #2 oil-fired boiler [U12] (PTI #03-3537);
   c) B003 – 8.5 mmBtu/hr natural gas and #2 oil-fired boiler [U13] (PTI #03-3537);
   d) P001 – FKM small banbury rubber mixing machine [SD1] (PTI #03-3475);
   e) P002 – small twin roll rubber mill with butcher [SD2] (PTI #03-3475);
   f) P039 – U-turn type batch-off machine [S27] (PTI #03-5384);
   g) P044 – twin wet blast and phosphating line no. 3 [B270] (PTI #03-8544); and
   h) P801 – solvent room – storage and mixing of coatings.

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

5. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 [including the Table(s) and appendix(ices) referenced in Subpart DDDDD]. The following emissions units in this permit are subject to the aforementioned requirements: B001, B002, and B003. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

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

6. The insignificant emissions unit listed in B.3.i), emissions unit P801, is subject to the applicable requirements specified in 40 CFR Part 63, Subpart MMMM, in accordance with 40 CFR Parts 63.3880 through 63.3981 [including the Table(s) and appendix(ices) referenced in Subpart MMMM]. The applicable requirements are summarized below:

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

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

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

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

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

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

      In accordance with the above definition, this emissions unit is a component of the “affected sources” (i.e. the MACT coating lines at the facility) under the MMMM MACT regulations and shall be included in all of the MACT requirements for the facility. All emissions from this emissions unit shall be included in the compliance calculations.

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

   b) The permittee shall develop and implement a work practice plan in accordance with 40 CFR Part 63.3893(b) to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials

generated by the controlled coating operation; or the permittee shall meet an alternative standard as provided in 40 CFR 63.3893(c).

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

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

e) Pursuant to 40 CFR 63.3930(i)(8), the permittee shall keep a record of the work practice plan required in 40 CFR 63.3893(c), and documentation that the permittee is implementing the plan on a continuous basis.

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

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

C. Emissions Unit Terms and Conditions

1. K062, Paint Spray Machine (B1121)

Operations, Property and/or Equipment Description:

Automatic Adhesive Spray Machine

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

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17419, issued 10-08-2009)	0.64 lb organic compounds (OC)/hr, 2.80 tons OC/yr from primer coating operations 0.64 lb OC/hr, 2.80 tons OC/yrfrom topcoat coating operations 139.50 lbs OC/month, 0.84 ton OC/yr from cleanup materials 0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined* 0.15 lb particulate emissions (PE)/hr, 0.66 ton PE/yr Visible PE shall not exceed 0% opacity as a six-minute average See b)(2)a, b(2)b and b)(2)c
b.	OAC rule 3745-21-09(U)(1)(c)	6.7 lbs of volatile organic compounds (VOC) per gallonof solids for an extreme performance coating where a control system is employed
c.	OAC rule 3745-17-07(A)	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See b)(2)e.
e.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114	See g)(1)
f.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a miscellaneous metal parts coating line with add-on controls (a regenerative thermal oxidizer), at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(4), this emissions unit meets the applicability criteria of the rubber to metal category. For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)f. through b)(2)k.
h.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with OAC rule 3745-21-09(U)(1)(c)OAC rule 3745-17-11(C), and 40 CFR Part 63, Subpart MMMM.

b. Best available technology (BAT) has been determined to be the following:

i. use of a regenerative thermal oxidizer (RTO);

ii. a CO emission rate of 0.90 lb CO/hr and 3.94 tons CO/yr from products of combustion from firing natural gas for the stack exhaust from the RTO for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined*; and

iii. an associated RTO minimum operating temperature of 1,508 degrees Fahrenheit.

c. The RTO shall meet the following requirements for OC emissions from this emission unit:

i. minimum OC destruction efficiency of 95%.

d. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because it is not subject to a mass emission limitation established pursuant to OAC rule 3745-17-11.

e. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) regulating particulate emissions (PE) from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-17419.

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

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

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

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

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

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

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

g. The options for compliance when using more than one type of coating are described in 40 CFR 63.3890(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain

documentation as required by 63.3930(c), and submit reports demonstrating compliance, as required in 63.3920. [See 40 CFR 63.3880-3981.]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

63.2 definitions:

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

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

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

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

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

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

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

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

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

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

(3) The RTO serving this emissions unit shall be employed at all times when the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

(4) The permittee shall implement and maintain, on an on-going basis, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations [See 40 CFR 63.3880-3981]. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating

operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

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

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

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

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

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

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain daily records of the following information for the clean-up operations:

a. the name and identification number of each clean-up material, employed;

b. the number of gallons of each clean-up material employed;

c. the OC content of each clean-up material, employed, in lbs/gal;

d. the OC input rate for clean-up material, d)(1)b. x d)(1)c., in lbs per day;

e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of d)(1)d.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(2) The permittee, having chosen to demonstrate compliance with the OAC rule 3745-21-09(U)(1)(c) limitation of 6.7 pounds of VOC per gallon of coating solids for an extreme performance coating where a control system is employed, shall collect and record the following information each day for the coating line and control equipment:

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

b. the VOC content of each coating, in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,3]:

c. the maximum VOC content per gallon of coating solids for all the coatings applied; or

d. the daily volume-weighted average VOC content in pounds of VOC per gallon of coating solids of all the coatings applied, calculated accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,3; and

e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the maximum VOC content of any coating applied or the daily volume-weighted average) using the overall control efficiency, as determined for the RTO during the most recent emission test that demonstrated that the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(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 or water wash while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system or water wash and shall maintain the following information:

a. the date of the inspection;

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

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

d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(7) The permittee shall maintain records that document any time periods when the dry particulate filter or water wash 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 or water wash was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

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

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

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

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

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

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

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

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

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

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

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

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

   where:

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

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

m is the number of coatings applied during the month.

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

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

where:

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

z is the number of coating operations without control.

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

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

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

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

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

y is the identifier for the month.

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

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

connection, shall be maintained and made available to the regulating agency upon request.

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

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

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

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

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

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

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

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(13) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

c. for each allowance applied in any month:

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

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

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

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

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

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

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(15) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1), PTI #03-17419, and 40 CFR Part 63, Subpart MMMM]

(16) Whenever the monitored combustion temperature within the RTO deviates from 1508 degrees Fahrenheit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment in conformance with the acceptable temperature value specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

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

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(17) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-17419, issued on 10/08/2009:d)(15). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing ofany daily record showing that the dry particulate filter system or water wash 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K062 which identify exceedances of any of the following:

a. any exceedances of the 139.50 lbs OC/month from cleanup material limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(3) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable 6.7 pounds of VOC per gallon of solids limitation for an extreme performance coating where a control system is employed, in accordance with OAC rule 3745-21-09(U)(1)(c). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

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

a. company name and address;

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

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

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

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

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

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

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

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

xxi. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

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

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

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

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

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

d. the explanation of the circumstances of the event;

e. the reasons for not following the SSMP;

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

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

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(8) Performance test results for the emission capture system(s) and thermal oxidizer(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the Director, or representative of the Director, upon request.

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

(9) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

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

(10) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the RTO was below the operating temperature of 1,508 degrees Fahrenheit;

b. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the RTO;

c. an identification of each incident of deviation described in e)(10)a. or e)(10)b. (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(10)a. or e)(10)b. where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(11)a. or e)(11)b. where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

f) Testing Requirements

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

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

This emissions unit shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

<u>Applicable Compliance Method</u>:

Compliance with the 95% minimum destruction efficiency (and 100% capture efficiency) was demonstrated by emissions testing. If required, future testing shall be conducted in accordance with Engineering Guide #16

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

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

0.64 lb OC/hr, 2.80 tons OC/yr from primer coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the primer coating operations for this emissions unit is based on a maximum hourly primer usage of 1.0 gallon per hour multiplied by the maximum solids content of 0.096 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly OC limitation is maintained, compliance with the annual OC limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

c. Emission Limitations:

0.64 lb OC/hr, 2.80 tons OC/yrfrom topcoat coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the topcoat coating operations for this emissions unit is based on a maximum hourly primer usage of 1.04 gallons per hour multiplied by the maximum solids content of 0.092 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

d. Emission Limitations:

139.50lbs OC/month, 0.84 ton OC/yr from cleanup materials

Applicable Compliance Method:

Compliance with this monthly limitation shall be determined by the recordkeeping in section d)(2) of this permit.

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year, then dividing by 2,000 lbs/ton. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

e. Emission Limitations:

0.90 lb CO/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO. If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

f. Emission Limitations:

0.15 lb PE/hr, 0.66 ton PE/yr

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, assumed to be 25%

CE = control efficiency of the control equipment, assumed to be 90%

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A- Test Methods 1-5.

The annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

g. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

h. Emission Limitation:

6.7 lbs of VOC per gallonof solids for an extreme performance coating; where a control system is employed

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

i. Emission Limitation:

For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in section d)(9) through d)(16) of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17419, and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit is subject to 40 CFR, Part 63, Subpart MMMM.

[PTI #03-17419]

2. K063, Paint Spray Machine (B1116)

Operations, Property and/or Equipment Description:

Automatic Water-Borne Paint Spray Machine

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

(1) d)(6) and d)(7).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17069, issued 03-30-2006)	0.88 lb of organic compounds (OC)/hour 0.17 lb of particulate emissions (PE)/hour and 0.74 ton of PE/year Visible particulate emissions shall not exceed 0% opacity as a six-minute average. Use of a water wash or dry filtration system. See b)(2)a.
b.	OAC rule 3745-31-05(D)	Emissions of OC shall not exceed 1.20 tons per rolling 12-month period. See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for an extreme performance coating
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(C)	See b)(2)d.
f.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	miscellaneous metal parts coating line without add-on controls, at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	63.3890(b)(1), this emissions unit meets the applicability criteria of the general use category. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e. through b)(2)h.
g.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with OAC rule 3745-31-05(D), OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-17-11(C), and 40 CFR Part 63, Subpart MMMM.

b. This permit establishes the following federally enforceable emission limitation in order to limit potential to emit (PTE) for the purpose of avoiding "Prevention of Significant Deterioration" (PSD) applicability. The federally enforceable emission limitation is based on the operational restriction in c)(1) which contains a coating usage restriction and a coating OC content restriction:

i. 1.2 tons OC per rolling 12-month period.

For the purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because it is not subject to a mass emission limitation established pursuant to OAC rule 3745-17-11.

d. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) regulating

particulate emissions (PE) from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-17069.

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

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

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

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

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

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

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

f. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890.

g. The permittee shall determine compliance with the applicable emission limitation(s) by selecting one or more of the options listed in 40 CFR 63.3891 (a) through (c). These options shall be applied as described in 40 CFR 63.3891.

h. The permittee, using the “compliant material” option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit in order to establish federally enforceable requirements which limit PTE for purposes of avoiding PSD applicability [see b)(2)b.]:

a. The maximum annual coating usage rate for emissions unit K063, shall not exceed 2,240 gallons, based upon a rolling, 12-month summation of the monthly coating usages; and

b. The OC content of each coating employed in this emissions unit shall not exceed 1.07 lbs per gallon, as applied.

[OAC rule 3745-77-07(A)(1) and PTI #03-17069]

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17069]

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

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

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

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

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

other standard operating procedures), operation and maintenance records, and inspection of the facility.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the water wash system or dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

(2) The permittee shall collect and record the following information each month for all the coatings employed in emissions unit K063:

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

b. The OC content of each coating, as applied, in pounds per gallon;

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

d. The number of gallons of each coating employed;

e. The total number of gallons of all the coatings employed [summation of d)(2)d. for all coatings];

f. The rolling, 12-month coatings usage rates, in gallons;

g. The OC emission rate for each coating employed [d)(2)b. x d)(2)d.], in pounds;

h. The total OC emission rate for all the coatings employed [summation of d)(2)g. for all coatings], in pounds or tons;

i. The rolling, 12-month OC emission rates, in tons; and

j. The rolling, 12-month coatings usage rate, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including at a minimum:

i. information from the supplier or manufacturer,

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

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

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

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

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

f. the organic HAP content of each coating, in pound of organic HAP emitted per gallon of coating solids used or kg of organic HAP emitted per liter of coating solids used, calculated as follows for each coating applied in the miscellaneous metal parts coating operations using the "compliant material" option:

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

where:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(6) The Permit to Install (PTI) [PTI #03-17069] for emissions units K062, K063, and P074 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4
Maximum Hourly Emission Rate (lbs/hr): 7.13
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 1207
MAGLC (ug/m3): 4486

Toxic Contaminant: 2-butoxyethanol

TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.69
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 123
MAGLC (ug/m3): 2301.49

Toxic Contaminant: triethylamine
TLV (mg/m3): 4.1
Maximum Hourly Emission Rate (lbs/hr): 0.19
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 33.92
MAGLC (ug/m3): 97.6

Toxic Contaminant: ethylene glycol
TLV (mg/m3): 93.6
Maximum Hourly Emission Rate (lbs/hr): 1.09
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 87.36
MAGLC (ug/m3): 2229

Physical changes to or changes in the method of operation of the emissions unit afterits installation or modification could affect the parameters used to determine whether ornot the "Air Toxic Policy" is satisfied. Consequently, prior to making a change thatcould impact such parameters, the permittee shall conduct an evaluation to determinethat the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permitteedetermines that the "Air Toxic Policy" will not be satisfied, the permittee will not makethe change. Changes that can affect the parameters used in applying the "Air ToxicPolicy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

[PTI #03-17069]

(7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-17069]

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

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

a. All exceedances of the rolling, 12-month OC emission limitation of 1.20 tons; and

b. All exceedances of the rolling, 12-month coatings usage restriction of 2,240 gallons.

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, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

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

a. Coatings that exceed 3.5 lbs of VOC/gallon minus water and exempt solvents; and

b. Coatings that exceed 1.07 lbs of OC/gallon, as applied.

The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

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

a. company name and address;

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

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

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

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

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

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

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

i. if there were no deviations from the emission limitations in 63.3890, a statement that there were no deviations from the emissions limitations during the reporting period; and

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

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

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

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

iv. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920(a)]

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

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

f) Testing Requirements

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

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

0.88 lbs OC/hr

<u>Applicable Compliance Method</u>:

The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly coatings usage rate (0.82 gallons per hour) by the maximum OC content of all the coatings (1.07 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

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

Emissions of OC shall not exceed 1.20 tons per rolling 12-month period

<u>Applicable Compliance Method</u>:

Compliance with the 1.20 tons per rolling 12-month period emission limitation shall be based upon the record keeping requirements specified in section d)(2) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

c. Emission Limitation:

0.17 lb of particulate emissions (PE)/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1 – TE)(1 – CE)

Where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

d. Emission Limitation:

0.74 ton PE/yr

Applicable Compliance Method:

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

e. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

f. Emission Limitation:

3.5 lbs VOC/gallon, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in d)(2) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

g. Emission Limitation:

The maximum annual coating usage rate shall not exceed 2,240 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method:

Compliance with the annual allowable coating usage rate shall be based upon the record keeping requirements specified in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

h. Emission Limitation:

1.07 pounds OC per gallon of coating, as applied

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the recordkeeping specified in section d)(2) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17069]

i. Emission Limitation:

For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in section d)(3) through d)(5) of this permit.

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

g) Miscellaneous Requirements

(1) None.

3. P037, BB240 Banbury Mixer #1 (S17-1)

Operations, Property and/or Equipment Description:

rubber compound banbury mixer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13850, issued 10/24/2002)	0.36 lb PE/hr and 1.58 tons PE/yr Visible particulate emissions shall not exceed 0% opacity as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(10), and e)(2).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a minimum design removal efficiency of 99%. BAT requirements also include compliance with the terms and conditions of this permit.

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

c) Operational Restrictions

(1) The pressure drop across the baghouse for this emissions unitshall bemaintained within the range of 1.5 to 8 inches of water while the emissions unit is inoperation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13850]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13850]

(2) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit pressure drop deviation (excursion) reports that identify that allperiods of time during which the pressure drop across the baghouses did not comply withthe allowable range specified above.

[OAC rule 3745-77-07(C)(1) and PTI #03-13850]

(2) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1), and 40 CFR Part 64]

f) Testing Requirements

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

a. Emission Limitations:

0.36 lb PE/hr and 1.58 tons PE/yr

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be determined by applying the minimum design removal efficiency of 99% to the maximum uncontrolled emission rate of 36 lbs PE/hr. Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr and dividing by 2000 lbs/ton. If required, compliance with the hourly PE emissions rate shall be determined with stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13850]

b. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13850]

g) Miscellaneous Requirements

(1) None.

4. P038, Roll Mill #1 (S26)

Operations, Property and/or Equipment Description:

Roll mill #1 – rubber milling machine controlled by a baghouse.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0116095, issued 01-27-2014)	Particulate emissions (PE) shall not exceed 0.36 pound/hour and 1.58 ton/year Visible PE shall not exceed 20% opacity, as a 6-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(7), and e)(2).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements for this emission unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

b. All particulate emissions from the baghouse are considered to be particulate matter with an aerodynamic diameter of less than 10 microns (PM10).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee

shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0116095, issued on January 27, 2014: **[d)(3)]**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1), and 40 CFR Part 64]

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0116095, issued on January 27, 2014: **[e)(1)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

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

PE shall not exceed 0.36 pound per hour and 1.58 tons per year.

<u>Applicable Compliance Method:</u>

The hourly PE limitation was determined by multiplying the actual hourly process weight rate of 2,682 pounds product/hr by the RMA* emission factor of 0.0136 lb PE/lb product processed, and applying a 99% control efficiency. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

*Rubber Manufacturers Association “Emission Factor Development Project”, September 1996, for internal mixing and milling.

[OAC rule 3745-77-07(C)(1) and PTI #P0116095]

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

Visible PE shall not exceed 20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the emission limitation above shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0116095]

g) Miscellaneous Requirements

(1) None.

5. P050, Glycol Dip Tank No.4 w/(1) Steam Cleaning System (B464)

Operations, Property and/or Equipment Description:

Glycol dip tank no.4 with (1) steam clean system (B464)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13938, issued 08-28-2003)	0.80 lbs organic compounds (OC)/hour, 3.50 tons OC/year See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #03-13938, issued 08-28-2003)	33 tons OC per rolling, 12-month period from all anti-vibration glycol dipping process operations See b)(2)b.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements include compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.

b. The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emissions units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, and P072 combined for purposes of avoiding PSD applicability.

For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

c) Operational Restrictions

(1) The maximum annual production of liquid filled engine mounts for anti-vibration glycol dipping process operations, emissions units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, and P072 shall not exceed 9,166,666 units per

year, based upon a rolling, 12-month summation of the production rates for these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month for emissions unit P050:

a. The production rate; and

b. The calculated OC emissions, in lbs. or tons, using the following equation:

OC emissions = (units produced/month) x (0.0072 pound OC/unit produced).

(2) The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, and P072 combined:

a. The total production rate;

b. The total OC emissions, in tons; and

c. The rolling 12-month summation of monthly OC emission rates, in tons.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, and P072 combined. The deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

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

0.80 lb OC/hr, 3.50 tons OC/yr

<u>Applicable Compliance Method</u>:

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of

0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

b. Emission Limitation:

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations, emissions units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, and P072 combined.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section d)(2).

g) Miscellaneous Requirements

(1) None.

6. P062, Auto Chemical Weighing & Conveyance System

Operations, Property and/or Equipment Description:

Automated Chemical Weighing & Conveyance System controlled by a baghouse.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0116778, issued 06-11-2014)	Particulate emissions (PE) shall not exceed 0.34 pound/hour and 1.49 tons/year Organic compound (OC) emissions shall not exceed 0.048 pound/hour and 0.21 ton/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(9), and e)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements for this emission unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

b. All particulate emissions from the baghouse are considered to be particulate matter with an aerodynamic diameter of less than 10 microns (PM10).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for PM10. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall install, calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading

is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1), PTI P0116778, and 40 CFR Part 64]

(3) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1), PTI P0116778,and 40 CFR Part 64]

(4) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1), PTI P0116778,and 40 CFR Part 64]

(5) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1), PTI P0116778, and 40 CFR Part 64]

(6) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1), PTI P0116778, and 40 CFR Part 64]

(7) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1), PTI P0116778, and 40 CFR Part 64]

(8) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1),PTI P0116778, and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1), P0116778, and 40 CFR Part 64]

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 0.34 pound/hour and 1.49 ton/year.

Applicable Compliance Method:

The hourly PE limitation was determined by multiplying the maximum hourly process weight rate of 1370 pounds product/hr by a product loss factor of 2.5%, and applying a 99% control efficiency. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0116778]

b. Emission Limitations:

OC emissions shall not exceed 0.048 pound/hour and 0.21 ton/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation by using the emission factor of 0.000153 lb/lb of product, from the Rubber Manufacturers Association's (RMA's) "Emission Factors Development Project", and the maximum capacity of each unit.

*Rubber Manufacturers Association "Emission Factor Development Project", September 1996, for internal mixing and milling.

If required, the permittee shall demonstrate compliance with the hourly emission limit in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A, as applicable.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0116778]

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the emission limitation above shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0116778]

g) Miscellaneous Requirements

(1) None.

7. P063, Auto Carbon Weighing & Conveyance System

Operations, Property and/or Equipment Description:

Automated Carbon Weighing & Conveyance System controlled by a baghouse.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0116778, issued 06-11-2014)	Particulate emissions (PE) shall not exceed 0.34 pound/hour and 1.49 tons/year See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(9), and e)(1).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements for this emission unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

b. All particulate emissions from the baghouse are considered to be particulate matter with an aerodynamic diameter of less than 10 microns (PM10).

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for PM10. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall install, calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity

(range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(3) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(4) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(5) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(6) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(7) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(8) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

(9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1), P0116778, and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1), P0116778, and 40 CFR Part 64]

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 0.34 pound/hour and 1.49 tons/year.

Applicable Compliance Method:

The hourly PE limitation was determined by multiplying the maximum hourly process weight rate of 1370 pounds product/hr by a product loss factor of 2.5%, and applying a 99% control efficiency. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0116778]

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the emission limitation above shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0116778]

g) Miscellaneous Requirements

(1) None.

8. P067, Vacuum System (US46)

Operations, Property and/or Equipment Description:

Vacuum System - US46

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13601, issued 06-27-2002)	0.34 lb particulate emissions (PE)/hr and 1.49 tons PE/yr 0.02 gr PE/dscf Visible particulate emissions shall not exceed 5% opacity as a six minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(10), and e)(2).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.

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

c) Operational Restrictions

(1) The pressure drop across the baghouse for this emissions unitshall bemaintained within the range of 1 to 8 inches of water while the emissions unit is inoperation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13601]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

(2) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit pressure drop deviation (excursion) reports that identify that allperiods of time during which the pressure drop across the baghouses did not comply withthe allowable range specified above.

[OAC rule 3745-77-07(C)(1), PTI #03-13601]

(2) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1) and 40 CFR Part 64]

f) Testing Requirements

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

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

0.02 gr PE/dscf

<u>Applicable Compliance Method</u>:

The 0.02 gr PM/dscf emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading concentration. If required, the permittee shall demonstrate compliance with the grains PM/dscf by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

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

0.34 lb PE/hr and 1.49 tons PE/yr

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (2000 acfm) and converting this value to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

Therefore, provided compliance is demonstrated with the 0.02 gr PM/dscf limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

9. P068, Carbon Dust Handling System (US54)

Operations, Property and/or Equipment Description:

Carbon Dust Handling System - US54

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13601, issued 06-27-2002)	0.09 lb particulate emissions (PE)/hr and 0.39 tons PE/yr 0.02 gr PE/dscf Visible particulate emissions shall not exceed 5% opacity as a six minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(10), and e)(2).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.

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

c) Operational Restrictions

(1) The pressure drop across the baghouse for this emissions unitshall bemaintained within the range of 1 to 6 inches of water while the emissions unit is inoperation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13601]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

(2) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit pressure drop deviation (excursion) reports that identify that allperiods of time during which the pressure drop across the baghouses did not comply withthe allowable range specified above.

[OAC rule 3745-77-07(C)(1), PTI #03-13601]

(2) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1) and 40 CFR Part 64]

f) Testing Requirements

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

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

0.02 gr PE/dscf

<u>Applicable Compliance Method</u>:

The 0.02 gr PM/dscf emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading concentration. If required, the permittee shall demonstrate compliance with the grains PM/dscf by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

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

0.09 lb PE/hr and 0.39 tons PE/yr

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (500 acfm) and converting this value to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr and dividing by 2000 lbs/ton.

Therefore, provided compliance is demonstrated with the 0.02 gr PM/dscf limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

10. P069, Auto-Handweigh System (S50/S51)

Operations, Property and/or Equipment Description:

Auto-Handweigh System - S14

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13601, issued 06-27-2002)	0.86 lb particulate emissions (PE)/hr and 3.77 tons PE/yr 0.02 gr PE/dscf Visible particulate emissions shall not exceed 5% opacity as a six minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(10), and e)(2).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with an outlet grain loading of 0.02 gr/dscf.

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

c) Operational Restrictions

(1) The pressure drop across the baghouse for this emissions unitshall bemaintained within the range of 1 to 6 inches of water while the emissions unit is inoperation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13601]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

(2) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the boiler operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit pressure drop deviation (excursion) reports that identify that allperiods of time during which the pressure drop across the baghouses did not comply withthe allowable range specified above.

[OAC rule 3745-77-07(C)(1), PTI #03-13601]

(2) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(A)(3)(c) and (C)(1) and 40 CFR Part 64]

f) Testing Requirements

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

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

0.02 gr PE/dscf

<u>Applicable Compliance Method</u>:

The 0.02 gr PM/dscf emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading concentration. If required, the permittee shall demonstrate compliance with the grains PM/dscf by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

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

0.86 lb PE/hr and 3.77 tons PE/yr

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.02 gr/dscf) by the maximum baghouse exhaust rate (5000 acfm) and converting this value to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the 0.02 gr PM/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

c. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13601]

g) Miscellaneous Requirements

(1) None.

11. P074, Glycol Dip Tank (B1114)

Operations, Property and/or Equipment Description:

Submerged Assembly Machine

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0116215, issued 03-03-14)	volatile organic compound (VOC) emissions shall not exceed 0.5 tons per month averaged over a rolling 12-month period. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(2) through d)(5) and e)(3).

(2) Additional Terms and Conditions

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

b. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC from emissions unit P074 is less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0116215]

(2) The PTI application for this emissions unit, P074, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

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

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

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold

Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

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

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

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 1.755

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 117.4

MAGLC (ug/m3): 1755.0

The permittee, has demonstrated that emissions of ethylene glycol, from emissions unit P074, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[PTI #P0116215]

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

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

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

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

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

[PTI #P0116215]

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

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

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

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

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

[PTI #P0116215]

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

[PTI #P0116215]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #P0116215]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0116215]

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

a. the original model input;

b. the updated model input;

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

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

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

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

[PTI #P0116215]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and PTI #P0116215]

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group -Group A: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033

EU ID	Operations, Property and/or Equipment Description
K004	Auto adhesive spray 1 (B30) miscellaneous metal parts coating operation
K009	Auto adhesive spray 2 (B95) miscellaneous metal parts coating operation
K013	Manual adhesive spray 3 (B75) miscellaneous metal parts coating operation
K016	Manual adhesive spray 4 (B165) miscellaneous metal parts coating operation
K017	Auto adhesive spray 3 (B123) miscellaneous metal parts coating operation
K018	Auto adhesive spray 4 (B124) miscellaneous metal parts coating operation
K030	Auto adhesive spray 7 (B360) miscellaneous metal parts coating operation
K031	Auto adhesive spray 8 (B361) miscellaneous metal parts coating operation
K032	Auto adhesive spray 9 (B362) miscellaneous metal parts coating operation
K033	Manual adhesive spray 5 (B365-1,2) miscellaneous metal parts coating operation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13938, issued 08-28-2003)	<u>For emissions units K004, K009, K018, K030, K031, and K032</u>: 7.07 lbs organic compounds (OC)/hour and 30.97 tons OC/year (including clean-up materials) 0.10 lb particulate emissions (PE)/hour and 0.44 ton PE/year <u>For emissions units K013 and K016</u>: 6.79 lbs organic compounds (OC)/hour and 29.74 tons OC/year (including clean-up materials) 0.10 lb particulate emissions (PE)/hour and 0.44 ton PE/year <u>For emissions unit K017</u>: 7.07 lbs organic compounds (OC)/hour

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and 30.97 tons OC/year (including clean-up materials) 0.11 lb particulate emissions (PE)/hour and 0.48 ton PE/year <u>For emissions unit K033</u>: 11.69 lbs organic compounds (OC)/hour and 51.2 tons OC/year (including clean-up materials) 0.11 lb particulate emissions (PE)/hour and 0.48 ton PE/year <u>For all emissions units in this group</u>: 7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents Visible particulate emissions shall not exceed 0% opacity as a 6-minute average 0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined* *This emissions limit was established in PTI 03-17419, issued 10-08-2009, for all emissions units controlled by the RTO. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI #03-13938, issued 08-28-2003)	255 tons OC per rolling, 365-day period, from all the emissions units identified in b)(2)c.
c.	OAC rule 3745-21-09(U)(2)(f)	See b)(2)a.
d.	OAC rule 3745-17-11(C)	See b)(2)d.
e.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), these emissions units are miscellaneous metal parts	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(4), these emissions units

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	coating lines with add-on controls (a regenerative thermal oxidizer), at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	meet the applicability criteria of the rubber to metal category. For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e. through b)(2)j.
f.	40 CFR 63.1-15	Table 2 to 40 CFR, Part 63, Subpart MMMM – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Permit to Install (PTI) #03-10256 was issued on March 1, 2001, with terms and conditions that defined Best Available Technology (BAT) as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).

b. For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

c. The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Coating operations, emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043, combined for purposes of avoiding “Prevention of Significant Deterioration” (PSD) applicability.

d. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan regulating particulate emissions from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as BAT requirements in PTI #03-10256, issued March 1, 2001.

e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the

United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

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

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

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

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

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

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

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

g. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-moth emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891, however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-63.3981].

h. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.

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

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

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

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

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

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

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

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

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

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

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

change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

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

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

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

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

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

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

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

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be

exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

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

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

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

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

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

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

c) Operational Restrictions

(1) The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13938]

(2) The permittee shall implement and maintain, on an on-going basis, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations [See 40 CFR 63.3880-3981]. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(2) In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, combined.

a. The name and identification number of each coating and clean-up material;

b. The OC content of each coating and clean-up material, as applied;

c. The VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];

d. The number of gallons of each coating and clean-up material employed;

e. The OC emission rates from each coating and clean-up material employed d)(2)b. x d)(2)d.;

f. The total OC emission rate from all coatings and clean-up material employed, (summation of e); and

g. The rolling 365-day summation of the total OC emission rate.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

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

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

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

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

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

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

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

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the

coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

m is the number of coatings applied during the month.

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

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

where:

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

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

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

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

where:

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

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

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

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

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

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

z is the number of coating operations without control.

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

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

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

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

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

y is the identifier for the month.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(5) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be Installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(6) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Each pressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to

calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(7) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw

performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(8) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(8)f., d)(8)g., and d)(8)h. as part of the SSMP.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(9) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(10) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash of dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K004 which identify exceedances of any of the following:

a. Any exceedances of the VOC content restrictions in section b)(2)b. of this permit; and

b. Any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(3) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and the beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

v. the calculation of the total volume of coating solids used each month, as required in this permit;

vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

viii. the date and time that each malfunction started and stopped;

ix. a brief description of the continuous parameter monitoring system (CPMS);

x. the date of the latest CPMS certification or audit;

xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(5) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(6) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(7) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(8) Performance test results for the emission capture system(s) and thermal oxidizer(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the Director, or representative of the Director, upon request.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(9) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

7.07 lbs OC/hour for emissions units K004, K009, K017, K018, K030, K031, and K032
6.79 lbs OC/hour for emissions units K013 and K016

11.69 lbs OC/hour for emissions units K033

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including clean-up materials, with a maximum usage of 1.01 gallons/hour at a maximum OC content of 7.0 lbs/gallon.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

b. Emission Limitations:

30.97 tons OC/year for emissions units K004, K009, K017, K018, K030, K031, and K032
29.74 tons OC/year for emissions units K013 and K016
51.20 tons OC/year for emissions unit K033

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

c. Emission Limitations:

0.01 lb PE/hour and 0.44 ton PE/year

Applicable Compliance Method:

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1 – TE) x (1 – CE)

Where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs/ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A – Test Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

d. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

e. Emission Limitations:

0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009,K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined*

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO. If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

f. Emission Limitation:

255 tons OC per rolling, 365-day period, from all Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, and K043, combined.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

g. Emission Limitation:

7.0 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(2) of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

h. Emission Limitation:

For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in section d)(3) through d)(12) of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group -Group B: K043, K055, K060

EU ID	Operations, Property and/or Equipment Description
K043	Manual adhesive spray machine (B540-1,2) miscellaneous metal parts coating operation
K055	Automatic Adhesive Spray Machine No. 10 - Miscellaneous Metal Parts Coating Operation (administrative modification to revise cleanup limitations)
K060	automatic adhesive spray machine - miscellaneous metal parts operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17419, issued 10-08-2009)	0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined <u>For emissions unit K043, individually</u>: 0.46 lb organic compounds (OC)/hr, 2.01 tons OC/yr from primer coating operations 0.48 lb OC/hr, 2.10 tons OC/yr from topcoat coating operations 0.07 ton OC/month, 0.87 ton OC/yr from cleanup materials 0.11 lb particulate emissions (PE)/hr, 0.48 ton PE/yr <u>For emissions units K055 and K060, individually</u>: 0.64 lb organic compounds (OC)/hr, 2.80 tons OC/yr from primer coating operations

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.64 lb OC/hr, 2.80 tons OC/yr from topcoat coating operations 139.50 lbs OC/month, 0.84 ton OC/yr from cleanup materials 0.15 lb particulate emissions (PE)/hr, 0.66 ton PE/yr <u>For emissions units K043, K055, and K060, individually</u>: Visible particulate emissions shall not exceed 0% opacity, as a six-minute average. See b)(2)a., b(2)f. and b)(2)g.
b.	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from all the emission units identified in b)(2)b. See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(c)	6.7 lbs of volatile organic compounds (VOC) per gallon of solids for an extreme performance coating, where a control system is employed
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	OAC rule 3745-17-11(C)	See b)(2)e.
g.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114	See g)(1)
h.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a miscellaneous metal parts coating line with add-on controls (a regenerative thermal oxidizer), at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(4), this emissions unit meets the applicability criteria of the rubber to metal category. For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)f. through b)(2)k.
i.	40 CFR 63.1-15	Table 2 to 40 CFR, Part 63, Subpart MMMM – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-31-05(D), and 40 CFR Part 63, Subpart MMMM.

b. The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, and K060 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

c. Surface coating operations are no longer subject to the particulate emission (PE) limitations established under OAC rule 3745-17-11(B). The regulation of PE for surface coating operations under OAC rule 3745-17-11(B) has been replaced by requirements established under OAC rule 3745-17-11(C). On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) resulting in the establishment of a specific set of work practices to control PE from surface coating operations.

d. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

e. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) regulating particulate emissions (PE) from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-17419.

f. Best available technology (BAT) for carbon monoxide (CO) emissions is determined to be the use of a regenerative thermal oxidizer (RTO), a CO emission rate of 0.90 lb CO/hr and 3.94 tons CO/yr from products of combustion from firing natural gas for the stack exhaust from the RTO for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055,

K060 and K062 combined, with an associated RTO minimum operating temperature of 1,508 degrees Fahrenheit.*

g. The RTO shall meet the following requirements for OC emissions from this emission unit:

   i. minimum OC destruction efficiency of 95%.

h. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

   The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

   i. all coating operations as defined in 40 CFR 63.3981;

   ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

   iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

   iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

   The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

i. The options for compliance when using more than one type of coating are described in 40 CFR 63.3890(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.3930(c), and submit reports demonstrating compliance, as required in 63.3920. [See 40 CFR 63.3880-3981.]

j. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-moth emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891,

however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-63.3981].

k. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.

l. The permittee shall develop, implement and maintain a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:

i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.

ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.

iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.

iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

v. The SSMP shall be written for the following purpose:

(a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;

(b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;

(c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and

(d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.

vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.

viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.

ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:

(a) does not address a startup, shutdown, or malfunction event that has occurred;

(b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;

(c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or

(d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).

xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.

xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

m. The emission standards set forth in 40 CFR Part 63, Subpart MMMM, shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and

evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system or water wash for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter or water wash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

(2) The permittee shall expeditiously repair the dry particulate filter or water wash or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

(3) The RTO serving this emissions unit shall be employed at all times when the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17419]

(4) The permittee shall implement and maintain, on an on-going basis, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations [See 40 CFR 63.3880-3981]. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart MMMM]

(5) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;

b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart MMMM, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;

c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;

d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;

e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;

f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;

g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations, is a deviation from the monitoring requirements.

[OAC rule 3745-77-07(A)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(6) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[OAC rule 3745-77-07(A)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(7) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[OAC rule 3745-77-07(A)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain daily records of the following information for the clean-up operations:

a. the name and identification number of each clean-up material, employed;

b. the number of gallons of each clean-up material employed;

c. the OC content of each clean-up material, employed, in lbs/gal;

d. the OC input rate for clean-up material, d)(1)b. x d)(1)c., in lbs per day;

e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of d)(1)d.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(2) In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, and K060 combined.

a. the name and identification number of each coating and cleanup material;

b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the OC emission rates from each coating and cleanup material employed d)(2)b. x d)(2)c.;

e. the total OC emission rate from all coatings and cleanup material employed, [summation of d)(2)d.]; and

f. the rolling 365-day summation of the total OC emission rate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(3) The permittee, having chosen to demonstrate compliance with the OAC rule 3745-21-09(U)(1)(c) limitation of 6.7 pounds of VOC per gallon of coating solids for an extreme performance coating where a control system is employed, shall collect and record the following information each day for the coating line and control equipment:

a. the name and identification number of each coating applied;

b. The VOC content of each coating, in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,3}$]:

c. the maximum VOC content per gallon of coating solids for all the coatings applied;or

d. the daily volume-weighted average VOC content in pounds of VOC per gallon of coating solids of all the coatings applied, calculated accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,3}$; and

e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the maximum VOC content of any coating applied or the daily volume-weighted average) usingthe overall control efficiency, as determined for the RTO during the most recent emission test that demonstrated that the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter or water wash, along with documentation of any modifications deemed necessary by the permittee. These

documents shall be maintained at the facility and shall be made available to the Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(5) The permittee shall conduct periodic inspections of the dry particulate filter or water wash to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(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 or water wash while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system or water wash and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(8) The permittee shall maintain records that document any time periods when the dry particulate filter or water wash 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 or water wash was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(9) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the

coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP, and

g. the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, calculated as follows:

$H_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$

where:

H_{TOT} is the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, i.e., the sum of the total mass of HAP calculated for each material, above; minus the calculated HAP in recovered materials, R_w, if meeting the requirements for this allowance.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$VOL_s = \sum_{h=1}^{m}(VOL_h)(V_h)$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the mass of organic HAP emission reduction for the month for the controlled coating operations, using the emissions capture system and the thermal oxidizer control, calculated as follows:

$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev}^*)\ (CE/100 \times DRE/100)$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations (or calculated for each system) during each month, in pound or kg.

* H_{dev} If an operating parameter deviates from that established as required in Table 1 to this subpart or if there is a malfunction of the CPMS equipment or the capture or control devices, the capture and control efficiency shall be assumed to be zero during the period of deviation unless an approval to use other efficiency data is obtained, per 40 CFR 63.3963(c)(2).

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\,(D_h)(W_h)$$

where:

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

r is the number of coatings used in the coating operations controlled by the thermal oxidizer during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)\,(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

q is the number of thinners/additives used in the coating operations controlled by the thermal oxidizer during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)\,(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

s is the number of cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)\,(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in pound or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pounds/gallon or kg/liter.

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pound/pound or kg/kg.

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

DRE is the organic HAP destruction efficiency of the thermal oxidizer, in percent.

j. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = \left[H_2 - \sum_{b=1}^{x} HAP_{contr,b}\right] + \sum_{d=1}^{z} H_4$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in pound or kg.

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in (g) above.

H_2 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in the controlled coating operations, (H_2 is calculated as the sum of the total mass of HAP from all materials applied in the coating operation(s) controlled by a/the thermal oxidizer, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

H_4 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in any uncontrolled coating operations (H_4 is calculated as the sum of the total mass of HAP from all materials applied in each uncontrolled coating operation, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

$HAP_{contr,\ b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation “b”, calculated as required in (i) above.

x is the number of controlled coating operations where emissions are captured and vented to the thermal oxidizer.

z is the number of coating operations without control.

k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids applied or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \frac{\sum_{y=1}^{n} HAP_{T,y}}{\sum_{y=1}^{n} VOL_{s,y}}$$

HAP_{comply} is the organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{T,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (j) above, in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(10) The permittee shall also maintain records of the following documentation for all controlled coating operations:

a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;

b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;

c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or

d. records for establishing the criteria for the temporary total enclosure or building enclosure:

i. if using the liquid-to-uncaptured-gas protocol the record shall include:

(a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;

(b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;

(c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

ii. if using the gas-to-gas protocol the record shall include:

(a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;

(b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;

f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;

g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(11) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(12) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Eachpressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(13) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to

demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(14) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(15)f., d)(15)g., and d)(15)h. as part of the SSMP.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(15) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(16) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

(17) Whenever the monitored combustion temperature within the RTO deviates from 1,508 degrees Fahrenheit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment in conformance with the acceptable temperature value specified above, unless the permittee determines that corrective action is not necessary and documents

the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northwest District Office. The permittee may request revisions to the permitted temperature value based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating temperature value will not constitute a relaxation of the monitoring requirements and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(18) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-17419, issued on 10/08/2009:d)(16). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry particulate filter system or water wash 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions units K043, K055, and K060 which identify exceedances of any of the following:

a. any exceedances of the 0.07 ton OC/month from cleanup material limitation, for emissions unit K043;

b. any exceedances of the 139.50 lbs OC/month from cleanup material limitation, for emissions units K055 and K060, individually; and

c. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, and K060 combined.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(3) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable 6.7 pounds of VOC per gallon of solids limitation for an extreme performance coating where a control system is employed, in accordance with OAC rule 3745-21-09(U)(1)(c). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the RTO during the operation of the emissions unit:

a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal oxidizer was below the operating temperature of 1,508 degrees Fahrenheit;

b. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the RTO;

c. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

(5) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and the beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

v. the calculation of the total volume of coating solids used each month, as required in this permit;

vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

viii. the date and time that each malfunction started and stopped;

ix. a brief description of the continuous parameter monitoring system (CPMS);

x. the date of the latest CPMS certification or audit;

xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(6) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(7) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(8) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(9) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(10) Performance test results for the emission capture system(s) and thermal oxidizer(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the Director, or representative of the Director, upon request.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

(11) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart MMMM; and PTI #03-17419]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

0.46 lb OC/hr, 2.01 tons OC/yr from primer coating operations, for emissions unit K043

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the primer coating operations for this emissions unit is based on a maximum hourly primer usage of 0.71 gallon per hour multiplied by the maximum solids content of 0.096 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly OC limitation is maintained, compliance with the annual OC limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

b. Emission Limitations:

0.48 lb OC/hr, 2.10 tons OC/yr from topcoat coating operations, for emissions unit K043

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the topcoat coating operations for this emissions unit is based on a maximum hourly topcoat usage of 0.78 gallon per hour multiplied by the maximum solids content of 0.092 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

c. Emission Limitations:

0.07 ton OC/month, 0.87 ton OC/yr from cleanup materials, for emissions unit K043

Applicable Compliance Method:

Compliance with this monthly limitation shall be determined by the recordkeeping in section d)(1) of this permit.

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

d. Emission Limitations:

0.11 lb PE/hr, 0.48 ton PE/yr, for emissions unit K043

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, assumed to be 25%

CE = control efficiency of the control equipment, assumed to be 90%

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A - Test Methods 1-5.

The annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

e. Emission Limitations:

0.64 lb OC/hr, 2.80 tons OC/yr from primer coating operations, for emissions units K055 and K060, individually

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the primer coating operations for this emissions unit is based on a maximum hourly primer usage of 1.0 gallon per hour multiplied by the maximum solids content of 0.096 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual OC emission limitation was developed by multiplying the hourly OC emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly OC limitation is maintained, compliance with the annual OC limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

f. Emission Limitations:

0.64 lb OC/hr, 2.80 tons OC/yr from topcoat coating operations, for emissions units K055 and K060, individually

Applicable Compliance Method:

The hourly emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the topcoat coating operations for this emissions unit is based on a maximum hourly primer usage of 1.04 gallons per hour multiplied by the maximum solids content of 0.092 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

g. Emission Limitations:

139.50 lbs OC/month, 0.84 ton OC/yr from cleanup materials, for emissions units K055 and K060, individually

Applicable Compliance Method:

Compliance with this monthly limitation shall be determined by the recordkeeping in section d)(1) of this permit.

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year, then dividing by 2,000 lbs/ton. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

h. Emission Limitations:

0.90 lb CO/hr, 3.94 tons CO/yr for the stack exhaust from the RTO for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060 and K062 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO. If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

i. Emission Limitation:

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, and K060 combined

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

j. Emission Limitation:

6.7 pounds of VOC per gallon of solids for an extreme performance coating; where a control system is employed

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

k. Emission Limitations:

0.15 lb PE/hr, 0.66 ton PE/yr, for emissions units K055 and K060, individually

Applicable Compliance Method:

Compliance with the hourly PE limitation shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, assumed to be 25%

CE = control efficiency of the control equipment, assumed to be 90%

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A - Test Methods 1-5.

The annual PE limitation was developed by multiplying the hourly PE limitation by 8760, and then dividing by 2,000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

l. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #03-17419]

m. Emission Limitation:

For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the recordkeeping requirements specified in section d)(10) through d)(17) of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit is subject to 40 CFR, Part 63, Subpart MMMM.

[PTI #03-17419]

14. Emissions Unit Group -Group C: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052, K053, K057, K058, K059

EU ID	Operations, Property and/or Equipment Description
K006	Paint spray machine 1 (B40-1)
K019	Paint spray machine 3 (B139-1)
K023	Paint spray machine 4 (B247-1)
K026	Paint spray machine 5 (B314-1)
K035	Paint spray machine 6 (B491-1)
K036	Paint spray machine 7 (B510-1)
K041	Paint spray machine 8 (B602-1)
K051	Paint spray machine 9 (auto spray)(B864)
K052	Paint spray machine 10 (auto spray)(B873)
K053	Paint spray machine 11 (auto spray)(B881)
K057	Water-borne Paint Spray Machine
K058	Surface Coating Operation For Miscellaneous Metal Parts For Anti-vibration Products Using A VOC Compliant Coating
K059	Automatic Adhesive Spray Machine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3) through d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (applicable to emissions units K006, K019, K023, K026, K035, K036, K041, K051, K052, and K053: PTI #03-13938, issued 08-28-2003; applicable to emissions unit K057: PTI #03-16082, issued 06-03-2004; applicable to emissions unit K058: PTI #03-16156, issued 06-03-2004; applicable to emissions unit K059: PTI #03-16201, issued 11-16-2004)	<u>For emissions units K006, K019, K023, K026, K035, K036, K041, and K053</u>: 0.63 lb organic compounds (OC)/hr and 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr and 0.57 ton PE/yr <u>For emissions units K051 and K052</u>: 0.83 lb OC/hr and 3.64 tons OC/yr 0.17 lb PE/hr and 0.74 ton PE/yr <u>For emissions unit K057</u>:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.68 lbs OC/hr and 2.98 tons OC/yr 0.13 lb PE/hr and 0.57 ton PE/yr <u>For emissions unit K058 and K059</u>: 0.84 lb of OC/hr and 3.68 tons OC/yr 0.17 lb PE/hr and 0.74 ton PE/yr <u>For all emissions units in this group:</u> Visible particulate emissions shall not exceed 0% opacity, as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emissions units identified in b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
d.	OAC rule 3745-17-11(C)	See b)(2)c.
e.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a miscellaneous metal parts coating line without add-on controls, at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(1), this emissions unit meets the applicability criteria of the general use category. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)d. through b)(2)k.
f.	40 CFR 63.1-15	Table 2 to 40 CFR, Part 63, Subpart

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		MMMM – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule also include use of a water wash or dry filtration system, and compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).

b. The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K051, K052, K053, K057, K058, and K059 combined, for the purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For the purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

c. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan regulating particulate emissions from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3) the permittee shall comply with the PE limitations established as best available technology requirements in the following PTIs: #03-13938, #03-16082, #03-16156, and #03-16201.

d. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

e. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890.

f. The permittee shall determine compliance with the applicable emission limitation(s) by selecting one or more of the options listed in 40 CFR 63.3891 (a) through (c). These options shall be applied as described in 40 CFR 63.3891.

g. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

c) Operational Restrictions

(1) The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

(2) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

[OAC rule 3745-77-07(A)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201; and 40 CFR: 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and

good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[OAC rule 3745-77-07(A)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201; and 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

(2) In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for the Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K051, K052, K053, K057, K058, and K059, combined.

a. The name and identification number of each coating, employed;

b. The OC content of each coating, in lbs/gallon, as applied;

c. The VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2];

d. The number of gallons of each coating employed;

e. The OC emission rates from each coating employed d)(2)b. x d)(2)d., in lbs;

f. The total OC emission rate from all coatings and clean-up material employed, in lbs [summation of d)(2)e.]; and

g. The rolling 365-day summation of the total OC emission rate, in tons.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

(3) The permits to install for emissions units K006, K019, K023, K026, K035, K036, K041, K051, K052, K053, K057, and K058 were evaluated based on the actual materials (typically coatings and clean-up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex – Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

For emissions unit K006, K019, K023, K026, K035, K036, and K041, individually (PTI #03-13938):

Pollutant: triethylamine
TLV (mg/m3): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37*
MAGLC (ug/m3): 100.24

Pollutant: 2-butoxyethanol
TLV (mg/m3): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075**
MAGLC (ug/m3): 2,338

*based on ISCST3 model
**based on SCREEN3 model

For emissions units K051, K052, and K053 (PTI #03-13938):

Pollutant: triethylamine
TLV (mg/m3): 4.14
Maximum Hourly Emission Rate (lbs/hr): 0.41
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9*
MAGLC (ug/m3): 98.54

Pollutant: 2-butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 1.90
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190.5*
MAGLC (ug/m3): 2,301

*Combined emission rates for K051, K052, and K053

For emissions unit K057 (PTI #03-16082):

Pollutant: 2-butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.54
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 58.58
MAGLC (ug/m3): 2,300.0

For emissions unit K058 (PTI #03-16156):

Pollutant: 2-butoxyethanol
TLV (mg/m3): 96.66
Maximum Hourly Emission Rate (lbs/hr): 0.72
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 127.6
MAGLC (ug/m3): 2,301.49

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTIs: #03-13938, #03-16082, and #03-16156]

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than OAC rule 3745-31-01(VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling as performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTIs: #03-13938, #03-16082, and #03-16156]

(5) For emissions unit K059, modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual increase in emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[PTI #03-16201]

(6) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including at a minimum:

i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,

iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.3890 and that each thinner, additive, and cleanup material applied in the miscellaneous metal parts coating operations contained no organic HAP*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the organic HAP content of each coating, in pound of organic HAP emitted per gallon of coating solids used or kg of organic HAP emitted per liter of coating solids used, calculated as follows for each coating applied in the miscellaneous metal parts coating operations using the "compliant material" option:

$H_{c=} (D_c) (W_c) / V_s$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per liter of coating solids used or pound of organic HAP emitted per gallon of coating solids used.

D_c is the density of coating "c", in kg coating per liter of coating or pound(s) of coating per gallon of coating, as determined in (c) above.

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

V_s is the volume fraction of coating solids in coating "c", liter of coating solids per liter coating, or gallon of coating solids per gallon of coating, as determined in (e) above; and

g. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.3890; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

[OAC rule 3745-77-07(C)(1); and 40 CFR: 63.3930, 63.3931, 63.3940, 63.3941, and 63.3942]

(7) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

b. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the records of the data and calculations used to determine the predominant activity;

c. if using the “facility-specific” emission limit under 40 CFR 63.3890(c)(2), the data used to calculate the “facility-specific” emission limit; and

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1); and 40 CFR: 63.3930(a) and 63.3931]

(8) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

[OAC rule 3745-77-07(C)(1); and 40 CFR: 63.3891(a), 63.3941, 63.3942, and 63.3931]

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 water wash system or the dry filtration system was not in service when the emissions units was in operation. 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 after the event occurs.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

(2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions units K006, K019, K023, K026, K035, K036, K041, K051, K052, K053, K057, K058, and K059, which identify exceedances of any of the following:

a. Any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and

b. Any exceedances of the 18.0 tons OC per rolling, 365-day period for the Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K051, K052, K053, K057, K058, and K059, combined.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information:

k. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

ii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

iii. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920(a)]

(4) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[OAC rule 3745-77-07(C)(1); and 40 CFR: 63.3891(a) and 63.3941(e)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

0.63 lb OC/hr and 2.76 tons OC/yr, for emissions units K006, K019, K023, K026, K035, K036, K041, and K053

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

b. Emission Limitations:

0.83 lb OC/hr and 3.64 tons OC/yr, for emissions units K051 and K052

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.82 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

c. Emission Limitations:

0.68 lb OC/hr and 2.98 tons OC/yr, for emissions unit K057

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.10 lbs per gallon.

[OAC rule 3745-77-07(C)(1) and PTI #03-16082]

d. Emission Limitations:

0.84 lb OC/hr and 3.68 tons OC/yr, for emissions units K058 and K059

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.82 gallons per hour and a maximum OC content of 1.03 lbs per gallon.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-16156 and #03-16201]

e. Emission Limitations:

i. 0.13 lb PE/hr and 0.57 ton PE/year, for emissions units K006, K019, K023, K026, K035, K036, K041, K053 and K057

ii. 0.17 lb PE/hr and 0.74 ton PE/year, for emissions units for emissions units K051, K052, K058 and K059

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A - Test Methods 1-5.

The annual PE limitation was developed by multiplying the hourly PE limitation by 8760, and then dividing by 2,000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be ensured.

[OAC rule 3745-77-07(C)(1); PTIs #03-13938, #03-16082 #03-16156 and #03-16201]

f. Emission Limitation:

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, and K053, combined.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

g. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

h. Emission Limitation:

3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings.

The permittee shall determine the composition of the viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

[OAC rule 3745-77-07(C)(1); and PTIs: #03-13938, #03-16082, #03-16156, and #03-16201]

i. Emission Limitation:

For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(6) through d)(8) of this permit.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

15. Emissions Unit Group -Group D: K045, K050

EU ID	Operations, Property and/or Equipment Description
K045	Eponics paint auto spray (B640) miscellaneous metal parts coating operation
K050	Eponics paint auto spray (B792) miscellaneous metal parts coating operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13938, issued 08-28-2003)	<u>For each emissions unit individually</u>: 57.6 lbs organic compounds (OC)/day from coating operations 0.02 ton OC/month and 0.24 ton OC/yr from clean-up materials 0.09 lb particulate emissions (PE)/hr and 0.39 ton PE/yr Visible particulate emissions shall not exceed 0% opacity, as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI #03-13938, issued 08-28-2003)	10.51 tons OC per rolling, 12-month period from K045 and K050 combined See b)(2)b.
c.	OAC rule 3745-17-11(C)	See b)(2)c.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
e.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	miscellaneous metal parts coating line without add-on controls, at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	63.3890(b)(1), this emissions unit meets the applicability criteria of the general use category. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e. through b)(2)h.
f.	40 CFR 63.1-15	Table 2 to 40 CFR, Part 63, Subpart MMMM – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule also include use of a water wash or dry filtration system, and compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).

b. The permittee has requested a federally enforceable limitation of 10.51 tons OC per rolling, 12-month period from emissions units K045 and K050, for the purposes of avoiding “Prevention of Significant Deterioration” (PSD) applicability. For the purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

c. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan regulating particulate emissions from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3) the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-13938, issued 08-28-2003.

d. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the

United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

f. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890.

g. The permittee shall determine compliance with the applicable emission limitation(s) by selecting one or more of the options listed in 40 CFR 63.3891 (a) through (c). These options shall be applied as described in 40 CFR 63.3891.

h. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

c) Operational Restrictions

(1) The permittee shall operate the water wash or dry filtration system whenever these emissions units are in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13938]

(2) The permittee shall not employ any coating, in excess of 5.76 lbs OC/gallon as applied.

[OAC rule 3745-77-07(A)(1) and PTI #03-13938]

(3) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart MMMM]

(4) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when these emissions units were in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(2) The permittee shall collect and record the following information each day for coating material usage in these emissions units:

a. The name and identification number of each coating employed;

b. The volume, in gallons, of each coating employed; and

c. The total volume, in gallons, of all coatings employed.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(3) The permittee shall collect and record the following each month for the clean-up material usage in these emissions units:

a. The name and identification number of each clean-up material employed;

b. The number of gallons of each clean-up material employed;

c. The OC content of each clean-up material employed, in lbs/gal;

d. The OC emission rate for clean-up material, d)(3)b. x d)(3)c. x 1 ton/2000 lbs., in tons per month; and

e. The total OC emission rate for all clean-up materials employed, summation of d)(3)d., in tons per month.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(4) The permittee shall collect and record the following each month for emissions units K045 and K050, combined:

a. The volume, in gallons, of each coating employed;

b. The organic compound (OC) content of each coating, in lbs/gallon, as applied;

c. The OC emission rate for each coating, d)(4)a. x d)(4)b. x 1 ton/2000 lbs, in tons per month;

d. The total OC emission rate for all coatings, sum of d)(4)c., in tons per month;

e. The total OC emission rate from all coatings and clean-up material employed, in tons per month, summation of d)(3)e. and d)(4)d.; and

f. The rolling 12-month summation of the monthly OC emissions rates.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(5) The permittee shall collect and record the following information each month for these emissions units:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu}).

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

$HAP_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$

where:

HAP_{TOT} is the total mass of organic HAP emissions for the month, in pound or kg.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$VOL_s = \sum_{h=1}^{m}(VOL_h)(V_h)$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \frac{\sum_{y=1}^{n} HAP_{TOT,y}}{\sum_{y=1}^{n} VOL_{s,y}}$$

HAP_{comply} is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{TOT,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (g) above, in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

j. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

(6) The permittee shall also maintain the following records for the miscellaneous metal parts coating lines:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

b. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the records of the data and calculations used to determine the predominant activity;

c. if using the “facility-specific” emission limit under 40 CFR 63.3890(c)(2), the data used to calculate the “facility-specific” emission limit; and

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity

determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

(7) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when these emissions units were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(2) In accordance with the Standard Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions units K045 and K050, which identify exceedances of any of the following:

a. Any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations;

b. Any exceedances of the 5.76 lbs OC/gallon operational restriction;

c. Any exceedances of the combined annual emission limitation of 10.51 tons OC per rolling, 12-month period for emissions units K045 and K050 combined; and

d. Any exceedances of the 0.02 ton OC/month from clean-up material limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the coating operations demonstrating compliance without add-on control, the report shall include the following information:

   i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

   ii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

   iii. if applicable, the calculation used to determine mass of organic HAP in waste materials; and

   iv. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

(4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission

reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

57.60 lb OC/day from coating operations

<u>Applicable Compliance Method</u>:

The emission limitation was established by multiplying a maximum coating OC content of 5.76 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitations will be assumed. Monitoring and recordkeeping of the OC content and daily usage are contained in sections d)(4)b. and d)(2)b., respectively.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

b. <u>Emission Limitations:</u>

0.09 lb PE/hr and 0.39 ton PE/year

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

E = (maximum coating solids usage rate in lbs/hr) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A - Test Methods 1-5.

The annual PE limitation was developed by multiplying the hourly PE limitation by 8760, and then dividing by 2,000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be ensured.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

c. Emission Limitation:

10.51 tons OC per rolling 12-month period from K045 and K050 combined.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

d. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

e. Emission Limitation:

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

f. Emission Limitations:

0.02 ton OC/month and 0.22 ton OC/year from clean-up operations

Applicable Compliance Method:

Compliance with this monthly limitation shall be determined by the recordkeeping in section d)(3) of this permit. The annual limitation was established by multiplying the monthly OC clean-up limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC clean-up limitation will be also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

g. Emission Limitation:

For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii)..

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(5) through d)(7) of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

16. Emissions Unit Group -Group E: K064 and K065

EU ID	Operations, Property and/or Equipment Description
K064	Miscellaneous metal parts coating operation
K065	Miscellaneous metal parts coating operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(f)	See b)(2)a.
b.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
c.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), these emissions units are miscellaneous metal parts coating lines with add-on controls (a regenerative thermal oxidizer), at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(4), these emissions units meet the applicability criteria of the rubber to metal category. For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)c. through b)(2)h.
d.	40 CFR 63.1-15	Table 2 to 40 CFR, Part 63, Subpart MMMM – Applicability of General

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

b. The application for this permit-to-install (PTI #P0105416, issued 10/30/09) was received after August 4, 2009 and as such is affected by an amendment of Ohio Revised Code (ORC) 3704.03(F) which became effective as a result of Senate Bill 265 of the 126th General Assembly (SB265). The ORC amendment is commonly referred to as "SB265" and one of the effects of this legislation is the removal of the ability of the Division of Air Pollution Control to require Best Available Technology (BAT) based on case specific determinations under OAC rule 3745-31-05(A)(3)(a). As such no BAT requirements have been established for the installation and operation of this emissions unit.

c. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

d. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890.

e. The permittee shall determine compliance with the applicable emission limitation(s) by selecting one or more of the options listed in 40 CFR 63.3891 (a) through (c). These options shall be applied as described in 40 CFR 63.3891.

f. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

c) Operational Restrictions

(1) The permittee shall install and operate a water wash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the water wash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI #P0105416]

(2) The permittee shall expeditiously repair the water wash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI #P0105416]

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

[OAC rule 3745-77-07(A)(1), PTI #P0105416, and 40 CFR 63.3892(a) and 40 CFR 63.3893(a)]

(4) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be

required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[OAC rule 3745-77-07(A)(1), PTI #P0105416, and 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance with OAC rule 3745-21-09(U)(1)(f) through the use of compliant coatings, shall collect and record the following information each month 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 CVOC,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 and Operate, 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(3) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(5) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(6) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(7) The potential to emit (PTE) for VOC from each of these emissions units is 0.54 pound per hour and 2.37 tons per year. The hourly PTE is based on a maximum coating usage rate of 1.11 gallons/hour and a maximum VOC content of 0.49 pound/gallon, as applied. The annual PTE is based on the hourly potential emission rate and a maximum operating schedule of 8760 hours per year. It should be noted that this emissions unit does not utilize any solvent material for cleanup operations.

The PTE for VOC for each emissions unit was evaluated based on information contained in the permit to install application. Prior to any physical change or change in the method of operation involving the coating operation (including cleanup), the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install modification prior to performing such change. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

(8) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including at a minimum:

i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,

iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.3890 and that each thinner, additive, and cleanup material applied in the miscellaneous metal parts coating operations contained no organic HAP*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per

liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the organic HAP content of each coating, in pound of organic HAP emitted per gallon of coating solids used or kg of organic HAP emitted per liter of coating solids used, calculated as follows for each coating applied in the miscellaneous metal parts coating operations using the "compliant material" option:

$H_{c=} (D_c) (W_c) / V_s$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per liter of coating solids used or pound of organic HAP emitted per gallon of coating solids used.

D_c is the density of coating "c", in kg coating per liter of coating or pound(s) of coating per gallon of coating, as determined in (c) above.

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

V_s is the volume fraction of coating solids in coating "c", liter of coating solids per liter coating, or gallon of coating solids per gallon of coating, as determined in (e) above; and

g. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.3890; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

[OAC rule 3745-77-07(C)(1), PTI #P0105416, and 40 CFR 63.3930, 40 CFR 63.3931, 40 CFR 63.3940, 40 CFR 63.3941, and 40 CFR 63.3942]

(9) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

b. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the records of the data and calculations used to determine the predominant activity;

c. if using the “facility-specific” emission limit under 40 CFR 63.3890(c)(2), the data used to calculate the “facility-specific” emission limit; and

d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1), PTI #P0105416, and 40 CFR 63.3930(a) and 40 CFR 63.3931]

(10) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.

[OAC rule 3745-77-07(C)(1), PTI #P0105416, and 40 CFR 63.3891(a), 40 CFR 63.3941, 40 CFR 63.3942, and 40 CFR 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings [relative to OAC rule 3745-21-09(U)(1)]. The notification shall include a copy of such record and shall be submitted electronically through Ohio EPA Air Services within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1), PTI #P0105416]

(2) The permittee shall submit quarterly deviation reports that identify any daily record showing that the water wash controlsystem 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.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services by January 31, April 30, July 31, and October 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI #P0105416]

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, a statement that there were no deviations from the emissions limitations during the reporting period; and

j. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information:

   i. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

   ii. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

   iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

   iv. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1), PTI #P0105416, and 40 CFR 63.3920(a)]

(4) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[OAC rule 3745-77-07(C)(1), PTI #P0105416, and 40 CFR 63.3891(a) and 40 CFR 63.3941(e)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 3.5 pounds of VOC per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be demonstrated by the record keeping in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0105416]

b. Emission Limitation:

For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii)..

Applicable Compliance Method:

Compliance with this limitation shall be determined by recordkeeping in section d)(8), d)(9), and d)(10) of this permit.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

17. Emissions Unit Group -Group F: K066 and K067

EU ID	Operations, Property and/or Equipment Description
K066	Adhesive Rotary Spray Machine (US146)
K067	Adhesive Rotary Spray Machine (US155)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI #P0108736 issued 03-14-12 for emissions unit K066, and PTI #P0113623 issued 05-28-13 for emissions unit K067)	<u>For K066 and K067, individually</u>: 0.95 lb volatile organic compounds (VOC)/hr, 4.16 tons VOC/yr, from primer and top coat coating operations, combined 698 lbs VOC/month, 4.19 tons VOC/yr, from cleanup materials 0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060, K062, and K066, combined. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-09(U)(1)(c)	6.7 lbs of volatile organic compounds (VOC) per gallon of solids, for an extreme performance coating; where a control system is employed
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), these emissions units are miscellaneous metal parts coating lines with add-on controls (a regenerative thermal oxidizer), at an existing miscellaneous metal parts coating facility subject to the emissions limitations/control measures specified in Subpart MMMM.]	The permittee shall comply with one of the five emissions limits identified in 40 CFR 63.3890(b)(1) through (5), or comply as provided in 40 CFR 63.3890(c). [In accordance with 40 CFR 63.3890(b)(4), these emissions units meet the applicability criteria of the rubber to metal category. For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period.] Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)d. through b)(2)i.
h.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of 40 CFR, Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which requires control equipment:

i. 0.95 lb OC/hr and 4.16 tons OC/yr, for primer and topcoating operations, combined;

ii. 698 lbs OC/month and 4.19 tons OC/yr, for clean-up materials; and

iii. 0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060, K062, and K066 combined.

b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

d. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

e. The options for compliance when using more than one type of coating are described in 40 CFR 63.3890(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.3930(c), and submit reports demonstrating compliance, as required in 63.3920. [See 40 CFR 63.3880-3981.]

f. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891, however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-3981.]

g. The coating operation shall comply with the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.

h. The permittee shall develop, implement, and maintain, a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:

i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.

ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.

iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.

iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the

process equipment malfunctions, such as conveyors that move parts among enclosures.

v. The SSMP shall be written for the following purpose:

(a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;

(b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;

(c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and

(d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.

vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.

viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided

the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.

ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:

(a) does not address a startup, shutdown, or malfunction event that has occurred;

(b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;

(c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or

(d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).

xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment,

and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.

xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

i. The emission standards set forth in 40 CFR Part 63, Subpart MMMM, shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. This emissions unit shall be vented to a regenerative thermal oxidizer, capable of achieving a minimum destruction efficiency of 95.0% (100% capture).

[OAC rule 3745-77-07(A)(1), PTI #P0108736, and PTI #P0113623]

(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.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, and PTI #P0113623]

(3) The permittee shall expeditiously repair the dry particulate filter or water wash or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, and PTI #P0113623]

(4) The permittee shall implement and maintain, on an on-going basis, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations [See 40 CFR 63.3880-3981]. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(5) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;

b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart MMMM, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;

c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;

d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;

e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;

f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;

g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations, is a deviation from the monitoring requirements.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63, Subpart MMMM]

(6) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or

other standard operating procedures), operation and maintenance records, and inspection of the facility.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63, Subpart MMMM]

(7) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[OAC rule 3745-77-07(A)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain monthly records of the following information for the coating operations:

a. the name and identification number of each coating employed;

b. the number of gallons of each coating employed;

c. the VOC content of each coating employed, in lbs/gal;

d. the VOC emission rate for each coating, in lbs per month [d)(1)b. x d)(1)c.];

e. the VOC emission rate for all coatings employed, in lbs per month, [summation of d)(1)d.];

(2) the total annual VOC emission rate for all coatings employed, in tons, summation of d)(1)e.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(3) The permittee shall collect and maintain monthly records of the following information for the clean-up operations:

a. the name and identification number of each clean-up material employed;

b. the number of gallons of each clean-up material employed;

c. the VOC content of each clean-up material employed, in lbs/gal;

d. the VOC emission rate for each clean-up material, in lbs per month [d)(1)b. x d)(1)c.];

e. the VOC emission rate for all clean-up materials employed, in lbs per month, [summation of d)(1)d.];

f. the total annual VOC emission rate for all clean-up materials employed, in tons, summation of d)(1)e.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(4) The permittee, having chosen to demonstrate compliance with a limitation based on pounds of VOC per gallon of coating solids, shall collect and record the following information each day for the coating line and control equipment:

a. the name and identification number of each coating applied;

b. for each coating, the calculation for the VOC content in pounds of VOC per gallon of coating solids and the record of each variable for each coating applied:

$C_{VOC,3} = (D_C)(W_{VOC}) / V_S$

where:

$C_{VOC,3}$ = VOC content, in pounds of VOC per gallon of solids

D_C = density of coating, in pounds of coating per gallon of coating

$W_{VOC} = W_{VM} – W_W - W_{ES}$

W_{VM} = weight fraction of VOC in coating, in pound of VOC 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_S = volume fraction of solids in coating, in gallon of solids per gallon of coating;

c. the maximum VOC content per gallon of coating solids for all the coatings applied; or

d. the daily volume-weighted average VOC content in pounds of VOC per gallon of coating solids of all the coatings applied, calculated as follows:

$$\left(C_{VOC,3}\right)_A = \frac{\sum_{i=1}^{n}\left(C_{VOC,3i}\right)(L_{Ci})(V_{Si})}{\sum_{i=1}^{n}(L_{Ci})(V_{Si})}$$

where:

$(C_{VOC,3})_A$ = daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied)

$C_{VOC,3}$ = VOC content, in pounds of VOC per gallon of solids

L_C = liquid volume of each coating employed during the day

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating

i = subscript denoting a specific coating employed during the day or averaging period

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during the day or during the averaging period.

e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the maximum VOC content of any coating applied or the daily volume-weighted average) using the overall control efficiency, as determined for the RTO during the most recent emission test that demonstrated that the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter or water wash, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(6) The permittee shall conduct periodic inspections of the dry particulate filter or water wash to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(7) 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 or water wash while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system or water wash and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(9) The permittee shall maintain records that document any time periods when the dry particulate filter or water wash 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 or water wash was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and P0113623]

(10) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: $V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$

where:

V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating

solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP, and

g. the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, calculated as follows:

$H_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$

where:

H_{TOT} is the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, i.e., the sum of the total mass of HAP calculated for each material, above; minus the calculated HAP in recovered materials, R_w, if meeting the requirements for this allowance.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$$VOL_s = \sum_{h=1}^{m}(VOL_h)(V_h)$$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the mass of organic HAP emission reduction for the month for the controlled coating operations, using the emissions capture system and the thermal oxidizer control, calculated as follows:

$$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev}^*)\ (CE/100 \times DRE/100)$$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations (or calculated for each system) during each month, in pound or kg.

* H_{dev} If an operating parameter deviates from that established as required in Table 1 to this subpart or if there is a malfunction of the CPMS equipment or the capture or control devices, the capture and control efficiency shall be assumed to be zero during the period of deviation unless an approval to use other efficiency data is obtained, per 40 CFR 63.3963(c)(2).

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\,(D_h)(W_h)$$

where:

Ac is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOLh is the volume of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

Dh is the density of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

Wh is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

r is the number of coatings used in the coating operations controlled by the thermal oxidizer during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)\,(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

q is the number of thinners/additives used in the coating operations controlled by the thermal oxidizer during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)\,(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

s is the number of cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)\,(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in pound or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pounds/gallon or kg/liter.

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pound/pound or kg/kg.

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

DRE is the organic HAP destruction efficiency of the thermal oxidizer, in percent.

j. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = \left[H_2 - \sum_{b=1}^{x} HAP_{contr,b}\right] + \sum_{d=1}^{z} H_4$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in pound or kg.

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in (g) above.

H_2 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in the controlled coating operations, (H_2 is calculated as the sum of the total mass of HAP from all materials applied in the coating operation(s) controlled by a/the thermal oxidizer, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

H_4 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in any uncontrolled coating operations (H_4 is calculated as the sum of the total mass of HAP from all materials applied in each uncontrolled coating operation, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

$HAP_{contr,\ b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation "b", calculated as required in (i) above.

x is the number of controlled coating operations where emissions are captured and vented to the thermal oxidizer.

z is the number of coating operations without control.

k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids applied or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \frac{\sum_{y=1}^{n} HAP_{T,y}}{\sum_{y=1}^{n} VOL_{s,y}}$$

HAP_{comply} is the organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{T,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (j) above, in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(11) The permittee shall also maintain records of the following documentation for all controlled coating operations:

a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of

organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;

b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;

c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or

d. records for establishing the criteria for the temporary total enclosure or building enclosure:

i. if using the liquid-to-uncaptured-gas protocol the record shall include:

(a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;

(b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;

(c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

ii. if using the gas-to-gas protocol the record shall include:

(a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;

(b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;

f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;

g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(12) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened.

The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be Installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(13) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Each pressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(14) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a “checklist” or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(15) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring

exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(15)f., d)(15)g., and d)(15)h. as part of the SSMP.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(16) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(17) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

Whenever the monitored combustion temperature within the RTO deviates from the operating temperature value specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

c. the date and time the deviation began;

d. the magnitude of the deviation at that time;

e. the date the investigation was conducted;

f. the name(s) of the personnel who conducted the investigation; and

g. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment in conformance with the acceptable temperature value specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

h. a description of the corrective action;

i. the date corrective action was completed;

j. the date and time the deviation ended;

k. the total period of time (in minutes) during which there was a deviation;

l. the temperature readings immediately after the corrective action was implemented; and

m. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northwest District Office. The permittee may request revisions to the permitted temperature value based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating temperature value will not constitute a relaxation of the monitoring requirements and may be incorporated into this permit by means of a minor permit modification

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance;

b. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the RTO;

c. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken;

e. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s); and

f. 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.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

(3) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and the beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

   i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

   ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

   iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

   iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

   v. the calculation of the total volume of coating solids used each month, as required in this permit;

   vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

viii. the date and time that each malfunction started and stopped;

ix. a brief description of the continuous parameter monitoring system (CPMS);

x. the date of the latest CPMS certification or audit;

xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(5) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(6) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(7) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

(8) The permittee shall submit annual reports that summarize the actual annual VOC emissions from both the coating operations and from the clean-up operations for emissions unit K066. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

This emissions unit shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

Applicable Compliance Method:

If required, compliance with the 95% minimum destruction efficiency shall be demonstrated based on emissions testing in accordance with Methods 1 through 4 and 25, or 25A of 40 CFR, Part 60, Appendix A; and selection of the appropriate method from 204A through 204F of Appendix M to 40 CFR Part 51 for capture efficiency.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

b. Emission Limitations:

0.95 lb VOC/hr and 4.16 tons VOC/yr for primer and topcoating operations, combined

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

* The potential to emit for the primer coating operations for this emissions unit is based on a maximum hourly primer usage of 0.71 gallons per hour multiplied by the maximum solids content of 0.096 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids. The potential to emit for the topcoat coating operations for this emissions unit is based on a maximum hourly primer usage of 0.78 gallons per hour multiplied by the maximum solids content of 0.092 gallon solids per gallon of coating, multiplied by the maximum allowed OC content of 6.7 lbs OC per gallon of coating solids.

Compliance with the annual limitation shall be determined by the recordkeeping in section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

c. Emission Limitations:

698 lbs OC/month and 4.19 tons OC/yr for clean-up materials

Applicable Compliance Method:

Compliance with the monthly emission limitation above shall be determined by the record keeping in section d)(2) of this permit.

The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is maintained with the monthly OC cleanup limitation, compliance with the annual cleanup limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

d. Emission Limitations:

0.90 lb carbon monoxide (CO)/hr, 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K013, K016, K017, K018, K030, K031, K032, K033, K043, K055, K060, K062, and K066, combined*

Applicable Compliance Method:

The permittee shall demonstrate compliance with the CO limitation above by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO. If required, the permittee shall demonstrate compliance with the CO emission limitation above by conducting emission testing in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8,760, and then dividing by 2,000. Therefore, as long as compliance with the hourly imitation is maintained, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

e. Emission Limitations:

6.7 pounds of VOC per gallon of solids for an extreme performance coating; where a control system is employed

Applicable Compliance Method:

Compliance with the VOC limitation above shall be determined by record keeping in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1),PTI #P0108736, and PTI #P0113623]

f. Emission Limitations:

For each existing rubber to metal coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 4.5 kg (37.7 lb) organic HAP emitted per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with the HAPs emission limitation above shall be determined by record keeping in section d)(4) of this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0108736, PTI #P0113623, and 40 CFR Part 63 Subpart MMMM]

g) MiscellaneousRequirements

(1) None.

18. Emissions Unit Group -Group G: P064 and P065

EU ID	Operations, Property and/or Equipment Description
P064	Banbury Mixer No. 2
P065	Roll Mill No. 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13085, issued 06-01-2004)	For P064 and P065, individually: 0.58 lb particulate emissions (PE)/hr and 2.54 tons PE/yr 0.65 lb organic compounds (OC)/hr and 2.85 tons OC/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, except as provided by rule.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d)(3) through d)(11), and e)(2).
e.	OAC rule 3745-21-07(M)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be use of a baghouse, use of non-photochemically reactive materials, and compliance with the terms and conditions of this permit.

b. The emissions limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

c. This emission unit is not subject to OAC rule 3745-21-07(M)(2) because this emissions unit does not meet all the requirements of OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

(1) The permittee shall only use non-photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] in emissions units P064 and P065.

[OAC rule 3745-77-07(A)(1) and PTI #03-13085]

(2) The pressure drop across the baghouse for emissions units P064 and P065 shall bemaintained within the range of 0.1 to 3 inches of water while the emissions units are inoperation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13085]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of these emissions units, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

[OAC rule 3745-77-07(C)(1), PTI #03-13085]

(2) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a fabric filter bag leak detection system. The indicator range is defined as a Continuous Particulate Monitor (CPM) analog output signal that is greater than 50% of scale for a preset limit for 60 seconds. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in Section e) below.

The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters and operating a fabric filter bag leak detection system, the permittee also has an inspection/preventative maintenance program for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicator and/or the baghouse and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection

system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following requirements:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the monitors.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1). The corrective action plan shall include, at a minimum, the following provisions:

a. inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions;

b. sealing off defective bags or filter media;

c. replacing defective bags or filter media, or otherwise repairing the control device;

d. sealing off a defective baghouse compartment;

e. cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; and

f. shutting down the boiler operations.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced, or fixed within a reasonable timeframe.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(9) At least once per month, the permittee shall perform a check of the bag cleaning mechanisms for proper function through visual inspection or equivalent means.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(10) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this Title V permit to

address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit pressure drop deviation (excursion) reports that identify that allperiods of time during which the pressure drop across the baghouses did not comply withthe allowable range specified above.

[OAC rule 3745-77-07(C)(1), PTI #03-13085]

(2) The permittee shall submit quarterly deviation (excursion) reports to , to the appropriate district or local office of the Division of Air Pollution Control, that identify the following:

a. all periods of time in which the bag leak detection alarm system was triggered; and

b. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

0.58 lb of PE/hr and 2.54 tons PE/yr

<u>Applicable Compliance Method:</u>

The permittee shall demonstrate compliance with the above limits by using the emission factor of 0.0136 lb/lb of product, from the Rubber Manufacturers Association's (RMA's) "Emission Factors Development Project", a minimum particulate control efficiency of 99%, and the maximum capacity of each unit.

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A - Test Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13085]

b. Emission Limitations:

0.65 lb OC/hr and 2.85 tons OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits by using the emission factor of 0.000153 lb/lb of product, from the Rubber Manufacturers Association's (RMA's) "Emission Factors Development Project", and the maximum capacity of each unit.

If required, the permittee shall demonstrate compliance with the above emission limit in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A, as applicable.

[OAC rule 3745-77-07(C)(1) and PTI #03-13085]

c. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13085]

g) Miscellaneous Requirements

(1) None.

19. Emissions Unit Group -H: P046, P047, P049, P051, P052, P053, P059, P060, P066, P070, P071, P072, P073

EU ID	Operations, Property and/or Equipment Description
P046	Glycol dip tank no.1 with (2) steam clean systems (B309)
P047	Glycol dip tank no.2 with (2) steam clean systems (B329)
P049	Glycol dip tank no.3 with (1) steam clean system (B462)
P051	Glycol dip tank no.5 with (1) steam clean system (B486)
P052	Glycol dip tank no.6 with (1) steam clean system (B505)
P053	Glycol dip tank no.7 with (1) steam clean system (B507)
P059	Glycol dip tank with steam cleaning operation B552 (submerged assembling machine 8)
P066	Glycol dip tank with steam cleaning operation B676 (submerged assembling machine)
P070	Glycol dip tank with steam cleaning operation B815 (submerged assembling machine)
P071	Glycol dip tank with steam cleaning operation B860 (submerged assembling machine)
P072	Glycol dip tank with steam cleaning operation B869 (submerged assembling machine)
P073	Glycol Dip Tank with Steam Cleaning Operation (Submerged Assembling Machine)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3) through d)(6).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (applicable to emissions units P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, and P072: PTI #03-13938, issued 08-28-2003; applicable to emissions unit P073: PTI #03-16156, issued 06-03-2004)	<u>For emissions units P046, P047, P049, P050, P051, P052, and P053, individually</u>: 0.80 lbs OC/hr and 3.50 tons OC/yr <u>For emissions unit P059, individually</u>: 0.42 lbs OC/hr and 1.84 tons OC/yr <u>For emissions unit P066, individually</u>: 0.76 lbs OC/hr and 3.33 tons OC/yr <u>For emissions unit P070, individually</u>: 0.65 lbs OC/hr and 2.85 tons OC/yr <u>For emissions units P071 and P072, individually</u>:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.73 lbs OC/hr and 7.58 tons OC/yr <u>For emissions unit P073, individually</u>: 1.30 lbs OC/hr and 5.69 tons OC/yr <u>For all emissions units in this group</u>: See b)(2)a.
b.	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emissions units identified in b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with OAC rule 3745-31-05(D).

b. The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined, for purposes of avoiding PSD applicability. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

c) Operational Restrictions

(1) The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined, shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

[OAC rule 3745-77-07(A)(1) and PTI #'s 03-13938 and 03-16156]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month for each Anti-Vibration Glycol Dipping Process Operations emissions unit, P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, individually:

a. The production rate; and

b. The calculated OC emissions in lbs or tons using the following equation:

OC emissions = (units produced/month) x (0.0072 lb OC/unit produced).

[OAC rule 3745-77-07(C)(1) and PTI #'s 03-13938 and 03-16156]

(2) The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined:

a. The rolling 12-month summation of monthly OC emissions rates, in tons [summation of d)(1)b. for all Anti-Vibration emissions units].

[OAC rule 3745-77-07(C)(1) and PTI #'s 03-13938 and 03-16156]

(3) The permit to install for emissions units P070, P071, and P072 was evaluated based on the actual materials (typically coatings and clean-up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex – Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Ethylene Glycol
TLV (mg/m3): 73.7
Maximum Hourly Emission Rate (lbs/hr): 2.87*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 414.3
MAGLC (ug/m3): 1,755.0

*Combined emission rates for P070, P071, and P072.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTI #03-13938]

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than OAC rule 3745-31-01(VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling as performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-13938]

(5) The permit to install for emissions unit P073 was evaluated based on the actual materials (typically coatings and clean-up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex – Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Ethylene Glycol
TLV (mg/m3): 73.7
Maximum Hourly Emission Rate (lbs/hr): 0.82
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.4
MAGLC (ug/m3): 1,754.76

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTI #03-16156]

(6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than OAC rule 3745-31-01(VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling as performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-16156]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P066, P070, P071, P072, and P073, combined. The deviation reports shall be submitted in accordance with 6the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #'s 03-13938 and 03-16156]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.80 lb OC/hr and 3.50 tons OC/yr for emissions units P046, P047, P049, P050, P051, P052, and P053, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

b. Emission Limitations:

0.42 lbs OC/hr and 1.84 tons OC/yr for emissions unit P059, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 58 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

c. Emission Limitations:

0.76 lbs OC/hr and 3.33 tons OC/yr for emissions unit P066, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 105 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

d. Emission Limitations:

0.65 lbs OC/hr and 2.85 tons OC/yr for emissions unit P070, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 90 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

e. Emission Limitations:

1.73 lbs OC/hr and 7.58 tons OC/yr for emissions units P071 and P072, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 240 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.

The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13938]

f. Emission Limitation:

1.30 lbs OC/hr and 5.69 tons OC/yr for emissions unit P073, individually

Applicable Compliance Method:

The hourly emissions limitations for these emissions units are based on the emissions unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 180 units produced/hour by an emissions factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing at similar emission units of March 12, 1997.
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-16156]

g. Emission Limitation:

33.0 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071, P072, and P073, combined

Applicable Compliance Method:

Compliance with this limitation shall be determined by the recordkeeping in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #'s 03-13938 and 03-16156]

g) Miscellaneous Requirements

(1) None.