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

10/2/2014

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: North Coast Container Corp.
Facility ID: 1318000399
Permit Type: Renewal
Permit Number: P0112930

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically 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 U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: Cleveland Division of Air Quality

# PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
North Coast Container Corp.

| | |
|---|---|
| Facility ID: | 1318000399 |
| Permit Number: | P0112930 |
| Permit Type: | Renewal |
| Issued: | 10/2/2014 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

**Division of Air Pollution Control**
**Title V Permit**
for
North Coast Container Corp.

**Table of Contents**


Authorization ..... 1
A. Standard Terms and Conditions ..... 2
1. Federally Enforceable Standard Terms and Conditions ..... 3
2. Monitoring and Related Record Keeping and Reporting Requirements ..... 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance ..... 6
4. Risk Management Plans ..... 7
5. Title IV Provisions ..... 7
6. Severability Clause ..... 7
7. General Requirements ..... 7
8. Fees ..... 8
9. Marketable Permit Programs ..... 8
10. Reasonably Anticipated Operating Scenarios ..... 9
11. Reopening for Cause ..... 9
12. Federal and State Enforceability ..... 9
13. Compliance Requirements ..... 10
14. Permit Shield ..... 11
15. Operational Flexibility ..... 11
16. Emergencies ..... 12
17. Off-Permit Changes ..... 12
18. Compliance Method Requirements ..... 12
19. Insignificant Activities or Emissions Levels ..... 13
20. Permit to Install Requirement ..... 13
21. Air Pollution Nuisance ..... 13
22. Permanent Shutdown of an Emissions Unit ..... 13
23. Title VI Provisions ..... 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only ..... 14
25. Records Retention Requirements Under State Law Only ..... 14
26. Inspections and Information Requests ..... 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements ..... 15
28. Permit Transfers ..... 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 15
30. Submitting Documents Required by this Permit ..... 16
B. Facility-Wide Terms and Conditions ..... 17
C. Emissions Unit Terms and Conditions ..... 19
1. K002, Exterior Drum Coating Line ..... 20
2. K004, Chine Coating Line ..... 32
3. Emissions Unit Group -spray booths: K001,K003, ..... 42

# Authorization

| | |
|---|---|
| Facility ID: | 1318000399 |
| Facility Description: | |
| Application Number(s): | A0046704 |
| Permit Number: | P0112930 |
| Permit Description: | Title V renewal permit for a drum lid coating line (K001), exterior drum coating line (K002), interior drum coating line (K003), and a chime coating line (K004). There is no PTI because these coating lines were installed in 1955. The coating lines are each equipped with a dry baffle filtration system. |
| Permit Type: | Renewal |
| Issue Date: | 10/2/2014 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0094283 |

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

North Coast Container Corp.
8806 Crane Ave.
Cleveland, OH 44105-8806

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

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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 Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Official that, 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality) 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

**17. Off-Permit Changes**

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

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

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

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

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

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

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

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

**18. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

**22. Permanent Shutdown of an Emissions Unit**

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

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

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

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

**23. Title VI Provisions**

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theCleveland Division of Air Quality.

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 Cleveland Division of Air Quality. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention RequirementsUnder State Law Only**

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

**26. Inspections and Information Requests**

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

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

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality, 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 permittee is currently subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) in accordance with 40 CFR Parts 63.3880 - 63.3981 including the Table(s) and Appendix(ices) referenced in Subpart MMMM hereto, and are hereby incorporated into this permit as if fully written.

   The following emissions units in this permit are currently subject to the aforementioned requirements: K001, K002, K003, and K004.

   [Authority for term: 40 CFR Part 63, Subpart MMMM]

3. The following insignificant emissions unit is located at this facility:

   F001 – unpaved driveway

   Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18 and/or 3745-21.

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

# C. Emissions Unit Terms and Conditions

## 1. K002, Exterior Drum Coating Line

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

Spray booth with a 5.4 mmBTU/hr natural gas-fired drying oven for coating the exterior of steel drums equipped with a dry baffle filtration system.

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 3745-17-07(A)(1) | Visible PE from the oven exhaust stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-10(B)(1) | PE from the oven exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input. |
| c. | OAC rule 3745-17-11(C) | See c)(1), c)(2) and d)(2) below. |
| d. | OAC rule 3745-18-06(B) | This unit is exempt from sulfur dioxide emission limitations based on a rated heat input capacity of less than 10 mmBTU/hr. |
| e. | OAC rule 3745-21-09(U)(1)(f) | Volatile organic compound (VOC) content shall be limited to 3.5 lbs VOC/gal of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum. |
| f. | 40 CFR Part 63 Subpart MMMM | See b)(2)a., b)(2)b. and b)(2)c. below. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| g. | 40 CFR Part 63 Subpart A<br>General Provisions | The permittee shall comply with the General Provisions of Subpart A as outlined in Table 2 of Subpart MMMM. |

(2) Additional Terms and Conditions

a. The limit for an existing general use coating affected source in 40 CFR 63.3890(b)(1) is 0.31 kg organic HAP/liter of coating solids (or 2.6 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR 63.3890(b)]

b. 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 (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) & 63.3883]

c. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

d. This emissions unit is exempt from the visible emissions (PE) limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h) for the spray booth stack.

c) Operational Restrictions

(1) A dry baffle filtration system must be operational and in use any time this emissions unit is in operation.

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

(2) The permittee shall operate the dry baffle filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry baffle filtration system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-17-11(C)]

(3) The permittee shall burn only natural gas in this emissions unit.

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

(4) 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.

[Authority for term: 40 CFR 63.3892(a) & 63.3893(a)]

(5) 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.

(6) 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 Cleveland Division of Air Quality (Cleveland DAQ), 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.

[Authority for term: 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records and document any time periods when the dry baffle filtration system was not in service when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry baffle filtration system with any modifications deemed necessary by the permittee during the time period in which the dry baffle filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the Cleveland DAQ upon request.

The permittee shall conduct periodic inspections of the dry baffle filtration system 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. The periodic inspections of the dry baffle filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry baffle filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry baffle filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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 Cleveland DAQ upon request.

In the event that the dry baffle filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry baffle filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry baffle filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the Cleveland DAQ upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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

a. the name, identification number, and classification (i.e. interior or exterior coating) of each coating, as applied; and

b. the VOC content of each coating in mass of VOC per volume of the coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f)]

(4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

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

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

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

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

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

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

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).

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: Vs = 1 - mvolatiles / Davg

where:

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

mvolatiles 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;

Davg 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 (VOLi) (Di) (Wi), for i=1,r

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 (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in (5)b. above, in gallons or liters.

Di is the density of material "i" as documented in (5)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in (5)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:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

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

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (5)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (5)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from 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 (5)f. above, in pound or kg.

Rw 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 Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

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

VOLs = SUM (VOLh) (Vh), for h=1,m

where:

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

VOLh is the total volume of coating "h" used during the month, as documented in (5)b. above, in gallons or liters.

Vh 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 (5)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:

HAPcomply = [SUM (HAPTOT, y), for y=1,12] / [SUM (VOLs, y), for y=1,12]

HAPcomply 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.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in (5)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in (5)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each 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. Following the initial compliance

period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

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.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, & 63.3952]

(6) 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.

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 the Cleveland DAQ. 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.

[Authority for term: 40 CFR 63.3930(a) & 63.3931]

e) Reporting Requirements

(1) The permittee shall include in the quarterly report any record of the date and length of time the dry baffle filtration system was not in service during coating application. The quarterly report shall be submitted by January 31, April 30, July 31, and October 31of each year to Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall notify the Cleveland DAQ of any monthly record showing the use of non-compliant coatings. This notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which it occurred.

[Authority for term: OAC rule(s) 3745-21-09(B)(3)(g) & 3745-77-07(C)(1)]

(3) The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. 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 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 there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, deviations from coating applications without add-on control shall include the following information:

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

(b) 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);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation.

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

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

a. Emission Limitation
Visible PE from the oven exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)]

b. Emission Limitation
PE shall not exceed 0.020 lb/mmBtu of actual heat input from the oven stack

Applicable Compliance Method
For the use of natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98) emission factor for $PM/PM_{10}$ (1.9 lbs/mmcf) and dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule(s) 3745-17-10(B)(1) & 3745-77-07(C)(1)]

c. Emission Limitation
VOC content shall be limited to 3.5 lbs VOC/gal of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum.

Applicable Compliance Method
Compliance with the above limitation shall be based on the record keeping specified in d) (a certificate of analysis using U.S. EPA Method 24 from the material supplier may be used to satisfy this requirement).

The VOC content of the coatings shall be determined using U.S. EPA Method 24, or an alternative equivalent method approved by the Cleveland DAQ.

[Authority for term: OAC rule 3745-21-10(B)]

d. Emission Limitation
0.31 kg organic HAP/liter of coating solids (2.6 lbs organic HAP/gal coating solids) used per rolling, 12-month period.

Applicable Compliance Method
Compliance shall be based upon the record keeping specified in d)(5).

[Authority for term: 40 CFR Part 63.3890(b)(1)]

g) Miscellaneous Requirements

(1) Emissions unit K002 was installed in June 1955.

**2. K004, Chine Coating Line**

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

Chime coating line equipped with a dry baffle filtration system.

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 3745-17-11(C) | See c)(1), c)(2) and d)(2) below. |
| b. | OAC rule 3745-21-09(U)(1)(f) | Volatile organic compound (VOC) content shall be limited to 3.5 lbs VOC/gal of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum. |
| c. | 40 CFR Part 63 Subpart MMMM | See b)(2)a., b)(2)b. and b)(2)c. below. |
| d. | 40 CFR Part 63 Subpart A General Provisions | The permittee shall comply with the General Provisions of Subpart A as outlined in Table 2 of Subpart MMMM. |

(2) Additional Terms and Conditions

a. The limit for an existing general use coating affected source in 40 CFR 63.3890(b)(1) is 0.31 kg organic HAP/liter of coating solids (or 2.6 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR 63.3890(b)]

b. 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 (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) & 63.3883]

c. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

d. Pursuant to OAC rule 3745-17-07(A)(3)(h), this emissions unit will be exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A) for the spray booth stack.

c) Operational Restrictions

(1) A dry baffle filtration system must be operational and in use any time this emissions unit is in operation.

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

(2) The permittee shall operate the dry baffle filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry baffle filtration system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(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.

[Authority for term: 40 CFR 63.3892(a) & 63.3893(a)]

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 Cleveland Division of Air Quality (Cleveland DAQ), 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.

[Authority for term: 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records and document any time periods when the dry baffle filtration system was not in service when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry baffle filtration system with any modifications deemed necessary by the permittee during the time period in which the dry baffle filtration system is utilized. 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.

The permittee shall conduct periodic inspections of the dry baffle filtration system 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. The periodic inspections of the dry baffle filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry baffle filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry baffle filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

In the event that the dry baffle filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry baffle filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry baffle filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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

a. the name, identification number, and classification (i.e. interior or exterior coating) of each coating, as applied; and

b. the VOC content of each coating in mass of VOC per volume of the coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f)]

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

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

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

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

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

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

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

   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);

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: Vs = 1 - mvolatiles / Davg

   where:

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

   mvolatiles 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;

Davg 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 (VOLi) (Di) (Wi), for i=1,r

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 (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in (4)b. above, in gallons or liters.

Di is the density of material "i" as documented in (4)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in (4)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:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

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

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (4)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (4)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from 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 (4)f. above, in pound or kg.

Rw 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 Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

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

VOLs = SUM (VOLh) (Vh), for h=1,m

where:

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

VOLh is the total volume of coating "h" used during the month, as documented in (4)b. above, in gallons or liters.

Vh 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 (4)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:

HAPcomply = [SUM (HAPTOT, y), for y=1,12] / [SUM (VOLs, y), for y=1,12]

HAPcomply 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.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in (4)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in (4)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each 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. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

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.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, & 63.3952]

(5) 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.

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 the Cleveland DAQ. 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.

[Authority for term: 40 CFR 63.3930(a) & 63.3931]

e) Reporting Requirements

(1) The permittee shall include in the quarterly report any record of the date and length of time the dry baffle filtration system was not in service during coating application. The quarterly report shall be submitted by January 31, April 30, July 31, and October 31 of each year to Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall notify the Cleveland DAQ of any monthly record showing the use of non-compliant coatings. This notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calender month during which it occurred.

[Authority for term: OAC rule(s) 3745-21-09(B)(3)(g) & 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. 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 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 there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, deviations from coating applications without add-on control shall include the following information:

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

(b) 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);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation.

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

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

a. Emission Limitation
VOC content shall be limited to 3.5 lbs VOC/gal of coating, excluding water and exempt solvents, for the exterior coating of a steel pail or drum.

Applicable Compliance Method
Compliance with the above limitation shall be based on the record keeping specified in d) (a certificate of analysis using U.S. EPA Method 24 from the material supplier may be used to satisfy this requirement).

The VOC content of the coatings shall be determined using U.S. EPA Method 24, or an alternative equivalent method approved by the Cleveland DAQ.

[Authority for term: OAC rule 3745-21-10(B)]

a. Emission Limitation
0.31 kg organic HAP/liter of coating solids (2.6 lbs organic HAP/gal coating solids) used per rolling, 12-month period.

Applicable Compliance Method
Compliance shall be based upon the record keeping specified in d)(4).

[Authority for term: 40 CFR Part 63.3890(b)(1)]

g) Miscellaneous Requirements

(1) Emissions unit K004 was installed in June 1955.

**3. Emissions Unit Group -spray booths: K001,K003,**

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| K001 | Spray booth with a 2.8 mmBTU/hr natural gas-fired drying oven for coating the interior of steel drum lids equipped with a dry baffle filtration system. |
| K003 | Spray booth with a 6.0 mmBTU/hr natural gas-fired drying oven for coating the interior of steel drums equipped with a dry baffle filtration system. |

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 3745-17-07(A)(1) | Visible PE from the oven exhaust stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-10(B)(1) | PE from the oven exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input. |
| c. | OAC rule 3745-17-11(C) | Exempt, pursuant to OAC rule 3745-17-11(A)(1)(j). |
| d. | OAC rule 3745-18-06(B) | This unit is exempt from sulfur dioxide emission limitations based on a rated heat input capacity of less than 10 mmBTU/hr. |
| e. | OAC rule 3745-21-09(U)(1)(e) | Volatile organic compound (VOC) content shall be limited to 4.3 lbs VOC/gal of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| f. | 40 CFR Part 63 Subpart MMMM | See b)(2)a., b)(2)b. and b)(2)c. below. |
| g. | 40 CFR Part 63 Subpart A<br>General Provisions | The permittee shall comply with the General Provisions of Subpart A as outlined in Table 2 of Subpart MMMM. |

(2) Additional Terms and Conditions

a. The limit for an existing general use coating affected source in 40 CFR 63.3890(b)(1) is 0.31 kg organic HAP/liter of coating solids (or 2.6 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR 63.3890(b)]

b. 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 (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) & 63.3883]

c. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

d. Pursuant to OAC rule 3745-17-07(A)(3)(h), this emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A) for the spray booth stack.

c) Operational Restrictions

(1) A dry baffle filtration system must be operational and in use any time this emissions unit is in operation.

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

(2) The permittee shall burn only natural gas in this emissions unit.

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

(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.

[Authority for term: 40 CFR 63.3892(a) & 63.3893(a)]

(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 Cleveland Division of Air Quality (Cleveland DAQ), 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.

[Authority for term: 40 CFR 63.6(e)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records and document any time periods when the dry baffle filtration system was not in service when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

a. the name, identification number, and classification (i.e. interior or exterior coating) of each coating, as applied; and

b. the VOC content of each coating in mass of VOC per volume of the coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and ORC rule 3745-21-09(B)(3)(f)].

(3) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

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

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

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

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

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

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

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).

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: Vs = 1 - mvolatiles / Davg

where:

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

mvolatiles 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;

Davg 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 (VOLi) (Di) (Wi), for i=1,r

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 (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in (4)b. above, in gallons or liters.

Di is the density of material "i" as documented in (4)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in (4)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:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

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

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (4)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (4)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from 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 (4)f. above, in pound or kg.

Rw 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 Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

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

VOLs = SUM (VOLh) (Vh), for h=1,m

where:

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

VOLh is the total volume of coating "h" used during the month, as documented in (4)b. above, in gallons or liters.

Vh 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 (4)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:

HAPcomply = [SUM (HAPTOT, y), for y=1,12] / [SUM (VOLs, y), for y=1,12]

HAPcomply 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.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in (4)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in (4)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each 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. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

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.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, & 63.3952]

(5) 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.

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 the Cleveland DAQ. 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.

[Authority for term: 40 CFR 63.3930(a) & 63.3931]

e) Reporting Requirements

(1) The permittee shall include in the quarterly report any record of the date and length of time the dry baffle filtration system was not in service during coating application. The quarterly report shall be submitted by January 31, April 30, July 31, and October 31 of each year to Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall notify the Cleveland DAQ of any monthly record showing the use of non-compliant coatings. This notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which it occurred.

[Authority for term: OAC rule(s) 3745-21-09(B)(3)(g) & 3745-77-07(C)(1)]

(3) The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. 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 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 there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, deviations from coating applications without add-on control shall include the following information:

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

(b) 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);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation.

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

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

a. Emission Limitation
Visible PE from the oven exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-17-03(B)(1)]

b. Emission Limitation
PE shall not exceed 0.020 lb/mmBtu of actual heat input from the oven stack.

Applicable Compliance Method
For the use of natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98) emission factor for $PM/PM_{10}$ (1.9 lbs/mmcf) and dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule(s) 3745-17-10(B)(1) & 3745-77-07(C)(1)]

c. Emission Limitation
VOC content shall be limited to 4.3 lbs VOC/gal of coating, excluding water and exempt solvents, for the interior coating of a steel pail or drum.

Applicable Compliance Method
Compliance with the above limitation shall be based on the record keeping specified in d) (a certificate of analysis using U.S. EPA Method 24 from the material supplier may be used to satisfy this requirement).

The VOC content of the coatings shall be determined using U.S. EPA Method 24, or an alternative equivalent method approved by the Cleveland DAQ.

[Authority for term: OAC rule 3745-21-10(B)]

d. Emission Limitation
0.31 kg organic HAP/liter of coating solids (2.6 lbs organic HAP/gal coating solids) used per rolling, 12-month period.

Applicable Compliance Method
Compliance shall be based upon the record keeping specified in d)(4).

[Authority for term: 40 CFR Part 63.3890(b)(1)]

g) Miscellaneous Requirements

(1) Emissions units K001 and K003 were both installed in June 1955.