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

11/18/2014

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: ABC Inoac Exterior Systems, LLC
Facility ID: 0372030199
Permit Type: Renewal
Permit Number: P0117093

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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
ABC Inoac Exterior Systems, LLC

Facility ID:	0372030199
Permit Number:	P0117093
Permit Type:	Renewal
Issued:	11/18/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
ABC Inoac Exterior Systems, LLC

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Authorization

Facility ID:	0372030199
Facility Description:	Coating of plastic parts.
Application Number(s):	A0050956, A0050971
Permit Number:	P0117093
Permit Description:	Renewal Title V operating permit for a plastics part painting facility.
Permit Type:	Renewal
Issue Date:	11/18/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0110616

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

ABC Inoac Exterior Systems, LLC
1410 Motor Drive
Fremont, OH 43420

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

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

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

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

24. Reporting Requirements Related to Monitoring and Record Keeping 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 theOhio EPA DAPC, Northwest District Office.

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

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

28. Permit Transfers

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

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

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

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

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

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

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

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

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following insignificant emissions 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. The insignificant emissions unit listed below is subject to one or more applicable requirement contained in a permit-to-install, or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

   a) B004 – 6.277 mmBtu/hr natural gas-fired boiler

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

3. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers and process heaters located at a major source of hazardous air pollutants (HAP). The following emission unit is designed to only burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the heating systems boilers and process heaters are subject to biennial tune-up requirements conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and a one-time energy assessment, performed in accordance with Table 3, #4 of the subpart. The permittee shall comply with the requirements of this NESHAP for the facility's existing boilers and process heaters no later than January31, 2016.

   a) B004 – 6.277 mmBtu/hr natural gas-fired boiler

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

C. Emissions Unit Terms and Conditions

1. K004, Paint Line #4

Operations, Property and/or Equipment Description:

Paint line 4 consisting of paint mixing operation, primer spray booth, primer curing oven, color spray booth, clearcoat spray booth, and clearcoat curing oven.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13836 issued 03-07-2006)	117.0 lbs volatile organic compounds (VOC)/hr [See b)(2)b. and b)(2)f.] 6.10 lbs particulate emissions (PE)/hr and 14.5 tons PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average See b)(2)c. and b)(2)d.
b.	OAC rule 3745-31-05(D) (PTI #03-13836 issued 03-07-2006)	277.8 tons VOC per rolling, 365-day period [See b)(2)b. and b)(2)e.]
c.	OAC rule 3745-21-07(M)(4)	Organic compound (OC) emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation [see b)(2)b. and b)(2)f.]
d.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu
e.	OAC rule 3745-17-11(C)	See b)(2)l.
f.	OAC rule 3745-18-06(A)	See b)(2)g.
h.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions unit is a plastic parts coating line subject to the emission	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	limitations/control measures specified in Subpart PPPP.]	both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.] See b)(2)h. Compliance shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)i., b)(2)j., and b)(2)k.
i.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Paint Line #4 includes the following operations:

i. Paint mixing operation;

ii. Primer spray booth with water curtain;

iii. Indirect-fired primer curing oven;

iv. Color spray booth with water curtain;

v. Clearcoat spray booth with water curtain; and

vi. Indirect-fired clearcoat curing oven.

b. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01(B)(16). The organic compound (OC) limitations for curing

operations established by OAC rule 3745-21-07(M)(4) represent emissions of OC as defined in OAC rule 3745-21-01(B)(12). The OC emissions from curing operations are considered VOCs for this emissions unit [See b)(2)f].

c. The requirements of this rule also include compliance with the requirements of OAC rules: 3745-31-05(D), 3745-17-10(B) and 3745-21-07(M)(4).

d. All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM_{10}).

e. The company has requested a federally enforceable emission limitation for Paint Line #4 of 277.8 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Line #4 is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

f. The VOC/OC emission limitations are applied as follows:

   i. The VOC limitation of 117.0 pounds/hr is established for all VOCs emitted from paint line #4 [See b)(2)a] and includes emissions from curing operations.

   ii. Each curing operation is also applicable to the requirement under OAC rule 3745-21-07(M)(4) that OC emissions do not exceed 3 lbs/hr and 15 lbs/day [See b)(2)b].

g. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

h. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

i. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(b) – emission rate without add-on controls option. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

j. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

k. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

l. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) regulating particulate emissions (PE). In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-13836.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(2) The permittee shall operate the water curtain system(s) whenever the paint booth(s) associated with this emissions unit is/are in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4492(a)	For any coating operation on which the “compliant materials” option or the “emissions rate without add-on controls” option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the “complaint materials” option or the “emissions rate without add-on controls” option is used, the permittee is not required to meet any work practice standards.

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

(4) If the permittee elects to change the current compliance option identified in b)(2)i., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the “emissions rate with add-on controls” option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40

CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line (cleanup operations associated with the coating operations are permitted under emissions unit P801):

a. Average pounds VOC/hour from coating operations for the entire line (total daily VOC emissions divided by total hours of coating operation);

b. Tons VOC/rolling, 365-day period from coating operations for the entire line;

c. Average pounds PE/hour from coating operations for the entire line (total daily PE emissions divided by total hours of coating operation);

d. Annual, year to date particulate emissions rate, in tons, from coating operations for the entire line [summation of the total daily PE in d)(1)c. for each calendar day to date from January to December].

e. Pounds OC/day* from each curing operation (oven) associated with the coating line; and

f. Average pounds OC/hour* from each curing operation (oven) associated with the coating line (total daily curing emissions for each oven divided by the total hours of curing operation).

*For purposes of calculating the OC emissions rates for curing operations as required in d)(1)e. and d)(1)f. above, the permittee shall utilize a value of 99.25 percent as the maximum percentage of OCs employed in each coating operation that is emitted uncontrolled from each coating operation. The remaining 0.75 percent of the OCs employed in each coating operation shall be considered to be the uncontrolled emissions for each coating operation's associated curing (oven). This "split" of OC emissions between the coating operations and their curing operations (ovens) was based upon emissions testing conducted by the permittee. The "split" of VOC emissions between the coating operations and their associated curing operations (ovens) shall be revised in accordance with the results of any future testing (weight%).

The OC emissions for curing operations regulated under OAC rule 3745-21-07(M)(4) represent emissions of OC as defined in OAC rule 3745-21-01. The OC emissions from curing operations are considered VOCs for this emissions unit.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office of local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

Subpart PPPP section	Subpart PPPP requirement
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate without add-on controls" compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.

63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the "emissions rate without add-on controls" compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the "emissions rate without add-on controls" compliance option.
63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(4) If the permittee elects to change the current compliance option identified in b)(2)i., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540, 63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(5) The permittee shall maintain daily records that document any time periods when the water curtain system(s) was/were not in service when the paint booth(s) associated with this emission unit was/were in operation.

[OAC rule 3745-77-07(C)(1) and PTI# 03-13836]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify each day during which the average hourly emissions exceeded any of the following:

a. 117.00 pounds VOC/hour;

b. 6.10 pounds PE/hour.

The permittee shall include in the report the actual average hourly emissions for each such day.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall submit annual reports that identify the total particulate emissions from coating operations for the entire line, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(3) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 277.8 tons VOC per rolling, 365-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(4) The permittee shall submit deviation (excursion) reports 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(5) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the

	end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

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

(6) If the permittee elects to change the current compliance option identified in b)(2)i., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(7) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

f) Testing Requirements

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

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

OC emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation

<u>Applicable Compliance Method</u>:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the hourly and daily OC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

b. Emission Limitations:

6.10 lbs PE/hr and 14.5 tons PE/yr

Applicable Compliance Method:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in Appendix A on Test Methods in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

d. Emission Limitations:

117.00 lbs VOC/hr and 277.8 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

e. Emission Limitation:

0.020 lb PE/mmBtu

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE

(filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

f. Emission Limitation:

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

The record keeping requirements specified in term d)(4) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the “emission rate without add-on controls” option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)i., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings employed in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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

2. K005, Paint Engineering Lab

Operations, Property and/or Equipment Description:

Paint engineering lab with dry filtration.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI #03-13836, modification issued 03-07-2006)	23.52 lbs volatile organic compounds (VOC)/day 0.04 lb particulate emissions (PE)/hr and 0.1 ton PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(D)	3.1 tons VOC per rolling, 365-day period See b)(2)c. and b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).

b. All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM_{10}).

c. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(16).

d. The company has requested a federally enforceable emission limitation for the paint engineering lab of 3.1 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.

e. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan (SIP) regulating particulate emissions (PE). In accordance with OAC rule 3745-17-11(C)(3), the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-13836.

c) Operational Restrictions

(1) Annual VOC emissions from this emissions unit shall not exceed 3.1 tons based upon a rolling, 365-day summation of the daily VOC emission rates. Compliance with the annual VOC emission limitation of 3.1 tons shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(2) The permittee shall operate the dry filtration system whenever the unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line:

a. pounds VOC/day;

b. tons VOC/rolling, 365-day period;

c. average pounds PE/hour (total daily PE emissions divided by total hours of operation);

d. annual, year to date particulate emission rate, in tons (summation of the total daily PE in "c" for each calendar day to date from January to December).

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emission unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the following emission limitations:

a. 23.52 pounds VOC/day;

b. 0.04 pound PE/hour

The permittee shall include in the report the actual emissions and hours of operation for each such day/hour.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall submit annual reports that identify the total particulate emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(3) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 3.1 tons VOC per rolling, 365-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(4) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

f) Testing Requirements

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

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

23.52 lbs VOC/day and 3.1 tons VOC per rolling, 365-day period

<u>Applicable Compliance Method</u>:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the daily and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

b. Emission Limitations:

0.04 lb PE/hr and 0.1 ton PE/yr

Applicable Compliance Method:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in Appendix A on Test Methods in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

g) Miscellaneous Requirements

(1) None.

3. K007, PL #5

Operations, Property and/or Equipment Description:

Paint Line #5 with RTO

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.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(F) (PTI P0111453, issued 10-15-2012)	<u>Controlled emissions</u> 4.11 lbs volatile organic compounds (VOC)/hour and 18.0 tons VOC/year, from the paint line (including cleanup) from the RTO stack <u>Uncontrolled emissions</u> 18.0 tons fugitive VOC/year from the paint line (including cleanup) See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11-30-01 (PTI P0111453, issued 10-15-2012)	<u>Emissions from natural gas combustion:</u> 0.58 lb nitrogen oxides (NOx)/hour and 2.54 tons NOx/year 0.50 lb carbon monoxide (CO)/hour and 2.20 tons CO/year 1.14 lbs VOC/hour and 5.0 tons VOC/year from the paint mixing/storage room stack See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12-01-06	See b)(2)d.
e.	OAC rule 3745-17-11(C)	See b)(2)e.
f.	40 CFR Part 63, Subpart PPPP	66.4490

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (c), this emissions unit is a new plastic parts coating line with add-on controls (a regenerative thermal oxidizer) subject to the emission limitations/control measures specified in Subpart PPPP.]	0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period [See b)(2)f.] See Section B.2 – Facility-Wide Terms and Conditions b)(2)g. and b)(2)h.
g.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements under ORC 3704.03(T) have been determined to be the compliance with 40 CFR Part 63, Subpart PPPP.

b. This permit establishes the following legally and practically enforceable operational restrictions for the purpose of limiting potential to emit (PTE). The legally and practically enforceable operational restrictions are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:

i. Controlled: 4.11 lbs VOC/hour and 18.0 tons VOC/year, from the paint line (including cleanup) from the RTO stack; and

ii. Uncontrolled: 18.0 tons fugitive VOC/year from the paint line (including cleanup).

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05was revised to conform to Ohio Revised Code (ORC) changes effective August3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S.

EPA approves the December 1, 2006 version of 3745-31-05, the requirements of3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan. The BAT requirements under OAC rule 3745-31-05(A)(3)(a), effective December 1, 2006 do not apply to the emissions of CO, NOx and VOC (from paint mixing/storage stack) from this emissions unit since the uncontrolled potential to emit for CO, NOx and VOC (from paint mixing and storage stack) is less than 10 tons per year.

It should be noted that this air contaminant source has emissions of sulfur dioxide (SO2), particulate matter 10 microns or less in size (PM10) and volatile organic compounds (VOC) which are associated with the combustion of natural gas. The potential emissions of SO2, PM10 and VOC from natural gas combustion are negligible and therefore have not been addressed within this permit.

e. The permittee shall operate the wet scrubber and 3-stage fabric filter control systems whenever this emissions unit is in operation.

f. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

g. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation (with emissions reductions achieved by emission capture systems and add-on controls) is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491, however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

h. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4500	General requirements

[OAC rule 3745-77-07(A)(1) PTI #P0111453 and 40 CFR Part 63, Subpart PPPP]

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)b.]:

a. For VOC emissions, this emissions unit shall be vented to a RTO which achieves an overall capture efficiency of 98% (based on a 90% capture efficiency for the prime booth and 100% capture efficiency from the rest of the paint line) and a 98% destruction efficiency from the entire paint line.

[OAC rule 3745-77-07(A)(1) and PTI #P0111453]

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

[OAC rule 3745-77-07(A)(1) and PTI #P0111453]

(3) The permittee shall operate and maintain the wet scrubber and 3-stage fabric filters for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The wet scrubber and 3-stage fabric filter control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #P0111453]

(4) The permittee shall expeditiously repair the wet scrubber and/or 3-stage fabric filters or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI #P0111453]

(5) The permittee shall comply with the operational restrictions required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) including the following sections:

Subpart PPPP section	**Subpart PPPP requirement**
63.4992(b) and Table 1	Operating limits for add-on control
63.4493(b)	Work practice standards for add-on control option

[OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart PPPP and PTI #P0111453]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month from coating and cleanup operations for the entire line:

a. the name and identification number of each coating/cleanup material, as applied;

b. the VOC content of each coating/cleanup material, as applied, in pounds per gallon;

c. the number of gallons of each coating/cleanup material employed in the paint line;

d. the uncontrolled VOC emissions from the paint line (including cleanup), in lbs [summation of the products of d)(1)b. x d)(1)c.];

e. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;

f. the total uncaptured (fugitive) VOC emissions from the paint line (including cleanup), in tons [d)(1)d. x 0.02 x 1 ton/2000 lbs];

g. the total controlled VOC emissions from all coating/cleanup materials applied, in lbs [summation of d)(1)d. x d)(1)e.] and;

h. the annual year-to-date controlled VOC emissions, in tons, for all coating/cleanup materials employed [summation of d)(1)g. for each calendar month to date from January to December divided by 2000 lbs/ton].

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.

a. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

   i. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

   ii. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

   These records shall be maintained at the facility for a period of three years.

b. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

   i. the date and time the deviation began;

   ii. the magnitude of the deviation at that time;

   iii. the date the investigation was conducted;

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

   v. the findings and recommendations.

c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary.

   i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary:

      (a) the reason corrective action was not necessary; and

      (b) the date and time the deviation ended.

   ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:

      (a) a description of the corrective action;

(b) the date corrective action was completed;

(c) the date and time the deviation ended;

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

(e) the temperature readings immediately after the corrective action was implemented; and

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

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the wet scrubber and 3-stage filter control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(6) The permittee shall conduct periodic inspections of the wet scrubber and 3-stage filter control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the wet scrubber and 3-stage filter control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(8) The permittee shall document each inspection (periodic and annual) of the wet scrubber and 3-stage filter control system and shall maintain the following information:

a. the date of the inspection;

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

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

d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(9) The permittee shall maintain records that document any time periods when the wet scrubber and/or 3-stage filter control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the wet scrubber and/0r 3-stage filter control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.

63.4530(c)(1), (c)(4)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate with add-on controls" compliance option, requirement to keep a record of the calculations specified in 63.4530(c)(4)(i) through c(4)(v)
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4560(a)	Timeline for conducting performance tests and other initial compliance demonstrations for "emission rate with add-on control" option for new and reconstructed affected sources
63.4561	Requirements for demonstrating initial compliance when using the "emission rate

	with add-on control" option
63.4563	Methodology for demonstrating continuous compliance with emission limitations when using "emission rate with add-on control" option
63.4568	Requirements for continuous parameter monitoring system installation, operation and maintenance

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI #P0111453]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(2) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(3) The permittee shall submit deviation (excursion) reports 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

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

a. any daily record showing that the wet scrubber/3-stage filter control system was not in service or not operated according to manufacturer's recommendations

(with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

(5) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate OHIO EPA District Office or local air agency, as are required pursuant to 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) per the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart PPPP and PTI #P0111453]

f) Testing Requirements

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

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

4.11 lbs VOC/hour and 18.0 tons VOC/year, combined from the paint line (including cleanup) from the RTO stack

<u>Applicable Compliance Method:</u>

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the hourly VOC emission limitation above.

The annual emission limitation represents the potential to emit and was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

b. Emission Limitation:

18.0 tons fugitive VOC/year from the paint line (including cleanup)

Applicable Compliance Method:

The annual fugitive VOC emission limitation shall be demonstrated through record keeping requirements specified in term d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

c. Emission Limitations:

0.58 lbNOx/hour and 2.54 tons NOx/year

Applicable Compliance Method:

The emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit is based on the combined maximum heat input from the RTO and (2) curing ovens, of 6.0 mmBtu/hour multiplied by the emission factor 100 lbsNOx/mm scf and dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98).

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

d. Emission Limitations:

0.50 lb CO/hour and 2.20 tons CO/year

Applicable Compliance Method:

The emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit is based on the combined maximum heat input from the RTO and (2) curing ovens, of 6.0 mmBtu/hour multiplied by the emission factor 84 lbs CO/mm scf and dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98).

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

e. Emission Limitations:

1.14 lbs VOC/hour and 5.0 tons VOC/year from paint mixing/storage stack

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit is based on the combined VOC emissions from loading loss and paint mixing. Loading loss emissions were calculated using Equation 8.4-1 from “Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2005)”, prepared for US EPA Emission Inventory Program (Referred as 2005 Guidance). Emissions from paint mixing were calculated using Equation 8.4-22 from the 2005 Guidance.

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0111453]

f. Emission Limitation:

0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method:

The record keeping requirements specified in term d)(10) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate with add-on controls" option found in 40 CFR 63.4491(c).

[OAC rule 3745-77-07(C)(1), PTI #P0111453 and 40 CFR Part 63, Subpart PPPP]

g) Miscellaneous Requirements

(1) None.

4. P021, Paint Blending Operation

Operations, Property and/or Equipment Description:

paint blending operations.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI #03-13836 issued 03-07-2006]	82.80 lbs volatile organic compounds (VOC)/day See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) [PTI #03-13836 issued 03-07-2006]	5.0 tons VOC per rolling, 365-day period See b)(2)a. and b)(2)c.
d.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions unit is a paint blending operation for a plastic parts coating line subject to the emission limitations/control measures specified in Subpart PPPP.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d. Compliance shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e., b)(2)f., and b)(2)g.
e.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01(B)(16).

b. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).

c. The company has requested a federally enforceable emission limitation for the Paint Blending operation of 5.0 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Blending is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.

d. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

e. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(b) – emission rate without add-on controls option. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

f. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

g. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

c) Operational Restrictions

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

Subpart PPPP section	Subpart PPPP requirement
63.4492(a)	For any coating operation on which the “compliant materials” option or the “emissions rate without add-on controls” option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the “complaint materials” option or the “emissions rate without add-on controls” option is used, the permittee is not required to meet any work practice standards.

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

(2) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the “emissions rate with add-on controls” option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40 CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall utilize an information management system, previously approved by the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:

a. Pounds VOC/day; and

b. Tons VOC per rolling, 365-day period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

Subpart PPPP section	Subpart PPPP requirement
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate without add-on controls" compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or

	other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the "emissions rate without add-on controls" compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the "emissions rate without add-on controls" compliance option.
63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540,

63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

e) Reporting Requirements

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

a. An identification of each day during which there was an exceedance of the daily emission limitation of 82.80 pounds VOC/day; and

b. An identification of any exceedances of the annual VOC emission limitation of 5.0 tons VOC per rolling, 365-day period.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in

	paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

f) Testing Requirements

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

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

82.80 lbs VOC/day and 5.0 tons VOC per rolling, 365-day period

<u>Applicable Compliance Method</u>:

The record keeping requirements specified in term d)(1) of this permit shall be used to determine compliance with the daily and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

The record keeping requirements specified in term d)(2) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate without add-on controls" option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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

5. P801, Paint Line #4 - Paint Clean-Up Operations

Operations, Property and/or Equipment Description:

facility wide cleanup operations.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	39.0 tons volatile organic compounds (VOC) per rolling, 12-month period (See b)(2)a.)
b.	OAC rule 3704.03(T) PTI #P0108597, issued 10-28-2011	See b)(2)b. and b)(2)c.
c.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions unit is a cleanup operation for a plastic parts coating line subject to the emission limitations/control measures specified in Subpart PPPP.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.] See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Compliance shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e., b)(2)f., and b)(2)g.
d.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes federally enforceable limitations for emissions of VOC for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.

Annual VOC emissions from emissions unit P801 shall not exceed 39.0 tons per rolling, 12-month period based on material usage restrictions [see c)(1)].

Facility wide cleanup is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.

b. The Best Available Technology (BAT) requirements under ORC rule 3704.03(T) have been determined to be compliance with the rolling, 12-month VOC emission limitation established under OAC rule 3745-31-05(D).

c. 71.0 tons organic compounds (OC) per year is generated from the solvent used for cleanup operations, however, the Best Available Technology (BAT) requirements under ORC 3704.03 (T) do not apply to the OC emitted from this emissions unit. BAT (under Senate Bill 265 changes) is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. OC is an air contaminant that does not involve an established NAAQS. Should the permittee make any changes to the solvent used for the cleanup operations which would increase volatile organic compound emissions, a permit modification would be required under OAC rule 3745-31-02 (A)(1).

d. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

e. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(b) – emission rate without add-on controls option. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

f. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

g. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of cleanup solvent employed in this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12}\sum_{i=1}\frac{(V_i G_i)}{2000\ lbs/ton} \leq 39.0\ tons$$

Where:

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

V_i = VOC content in pounds per gallon of each cleanup solvent employed

G_i = Gallons used of each cleanup solvent for the rolling 12-month period

n = total number of unique cleanup solvents employed in emission unit P801

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #P0108597]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4492(a)	For any coating operation on which the "compliant materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the "complaint materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any work practice standards.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40 CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:

a. the company name and identification of each cleanup solvent used;

b. the total VOC emission rate, in tons per month; and

c. the rolling, 12-month summation of the VOC emission rates.

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #P0108597]

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

Subpart PPPP section	Subpart PPPP requirement
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate without add-on controls" compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.

63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the "emissions rate without add-on controls" compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the "emissions rate without add-on controls" compliance option.
63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540, 63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the rolling, 12-month VOC emission limitation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI #P0108597]

(2) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart PPPP, per the following sections:

Subpart PPPP section	Subpart PPPP requirement
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of

	paragraphs (a)(1) through (a)(7) of this section.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

f) Testing Requirements

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

a. Emission Limitation: 39.0 tons VOC per rolling, 12-month period

Applicable Compliance Method: Compliance with the ton per rolling, 12-month period emission limitation above shall be demonstrated by the record keeping requirements established in term d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0108597]

b. Emission Limitation:

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate without add-on controls" option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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