



12/10/2014

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0302000166
 Permit Number: P0117921
 Permit Type: Initial Installation
 County: Allen

Certified Mail

| | |
|-----|------------------------------------|
| Yes | TOXIC REVIEW |
| No | PSD |
| Yes | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| No | MAJOR GHG |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



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

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana



Response to Comments

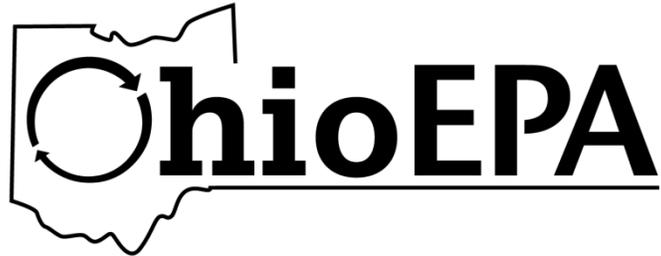
| | |
|--|---|
| Facility ID: | 0302000166 |
| Facility Name: | DTR Industries Incorporated |
| Facility Description: | Anti-vibration rubber and automotive hose parts manufacturing facility. |
| Facility Address: | 320 Snider Road Bluffton, OH 45817 Allen County |
| Permit: | P0117921, Permit-To-Install - Initial Installation |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 11/05/2014. The comment period ended on 12/05/2014. | |
| Hearing date (if held) | N/A |
| Hearing Public Notice Date (if different from draft public notice) | N/A |

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
DTR Industries Incorporated**

| | |
|----------------|----------------------|
| Facility ID: | 0302000166 |
| Permit Number: | P0117921 |
| Permit Type: | Initial Installation |
| Issued: | 12/10/2014 |
| Effective: | 12/10/2014 |



Division of Air Pollution Control
Permit-to-Install
for
DTR Industries Incorporated

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Final Permit-to-Install
DTR Industries Incorporated
Permit Number: P0117921
Facility ID: 0302000166
Effective Date: 12/10/2014

Authorization

Facility ID: 0302000166
Facility Description: Anti-vibration rubber and automotive hose parts manufacturing facility.
Application Number(s): A0052061
Permit Number: P0117921
Permit Description: Initial installation of two adhesive spray machines with water wash systems for miscellaneous metal parts coating.
Permit Type: Initial Installation
Permit Fee: \$400.00
Issue Date: 12/10/2014
Effective Date: 12/10/2014

This document constitutes issuance to:

DTR Industries Incorporated
320 Snider Road
Bluffton, OH 45817

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

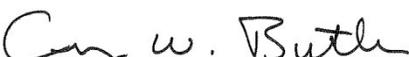
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117921
Permit Description: Initial installation of two adhesive spray machines with water wash systems for miscellaneous metal parts coating.

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

Group Name: Adhesive Spray Machines

| | |
|-----------------------------------|--------------------------------|
| Emissions Unit ID: | K068 |
| Company Equipment ID: | Adhesive Spray Machine (B1402) |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K069 |
| Company Equipment ID: | Adhesive Spray Machine (B1404) |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install
DTR Industries Incorporated
Permit Number: P0117921
Facility ID: 0302000166
Effective Date: 12/10/2014

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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 permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Final Permit-to-Install
DTR Industries Incorporated
Permit Number: P0117921
Facility ID: 0302000166
Effective Date: 12/10/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
DTR Industries Incorporated
Permit Number: P0117921
Facility ID: 0302000166
Effective Date: 12/10/2014

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.



Final Permit-to-Install
DTR Industries Incorporated
Permit Number: P0117921
Facility ID: 0302000166
Effective Date: 12/10/2014

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Adhesive Spray Machines: K068,K069,

| EU ID | Operations, Property and/or Equipment Description |
|-------|---|
| K068 | Adhesive Spray Machine (B1402) (formerly TMP188877) |
| K069 | Adhesive Spray Machine (B1404) (formerly TMP188878) |

- 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) | <p><u>From each emissions unit individually</u> 0.95 lb volatile organic compounds (VOC)/hr; 4.16 tons VOC/year, from primer and top coat coating operations, combined</p> <p>698 lbs VOC/month; 4.19 tons VOC/year from cleanup materials</p> <p>0.90 lb carbon monoxide (CO)/hr; 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055, K056, K060, K062, K066, K067, K068 and K069, combined</p> <p>See b)(2)a. and c)(1)</p> |
| b. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | See b)(2)b. and b)(2)c. |
| c. | OAC rule 3745-31-05(A)(3), as effective 12/01/06 | See b)(2)d. |
| d. | OAC rule 3745-21-09(U)(1)(c) | 6.70 lbs of volatile organic compounds (VOC) per gallon of solids, for an extreme performance coating; where a control system is employed. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| e. | OAC rule 3745-17-11(C) | See c)(2), c)(3) and d)(11) through d)(15) and e)(1)f. |
| f. | 40 CFR, Part 63, Subpart Mmmm (40 CFR 63.3880-3968) [In accordance with 40 CFR 63.3881, this is a new rubber-to-metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.] | <u>63.3890(a)(4) or 63.3890(c):</u> Emissions of organic hazardous air pollutants (HAPs) shall not exceed 4.5 kg (37.7 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)e. through b)(2)j. |
| g. | 40 CFR 63.1-15 (40 CFR 63.3901) | Table 2 of Subpart Mmmm of 40 CFR Part 63- Applicability of General Provisions to Subpart Mmmm shows which parts of the general provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which requires control equipment:
 - i. 0.95 lb VOC/hr; 4.16 tons VOC/year from primer and top coating operations, combined from each emissions unit individually;
 - ii. 698 lbs VOC/month; 4.19 tons VOC/year, for cleanup materials, from each emissions unit individually; and
 - iii. 0.90 lb CO/hr; 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055, K056, K060, K062, K066, K067, K068 and K069, combined.
- b. The Best Available Technology (“BAT”) requirement established under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, has been determined to be the following:
 - i. For VOC emissions, the RTO shall achieve a minimum destruction efficiency of 95% [as established under OAC rule 3745-31-05(D)]; and



- ii. CO emission shall not exceed 3.94 tons per year [as established under OAC rule 3745-31-05(D)].

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

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the VOC and CO emissions since the potential to emit of these pollutants is less than 10 tons per year, taking into account the federally enforceable restrictions established under OAC rule 3745-31-05(D) in this permit.

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

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

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.



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

- f. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890.
- g. The permittee shall determine compliance with the applicable emission limitation(s) by selecting one or more of the options listed in 40 CFR 63.3891 (a) through (c). These options shall be applied as described in 40 CFR 63.3891.
- h. The coating operation shall comply with the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.
- i. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:
 - i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.
 - ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.
 - iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.
 - iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.
 - v. The SSMP shall be written for the following purpose:
 - (a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;
 - (b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;



- (c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and
 - (d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.
- vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.
- vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.
- viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.
- ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:
 - (a) does not address a startup, shutdown, or malfunction event that has occurred;
 - (b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;



- (c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or
- (d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

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

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

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

- x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).
- xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.
- xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.
- xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.
- xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the



relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

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

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
 - a. This emissions unit shall be vented to a regenerative thermal oxidizer, capable of achieving a minimum destruction efficiency of 95% (100% capture).
- (2) The permittee shall install and operate a waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (4) The permittee shall develop and implement, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:
 - a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;
 - b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;
 - c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;
 - d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed,



except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

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

- (5) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:
- a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;
 - b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart Mmmm, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;
 - c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;
 - d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;
 - e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;
 - f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;
 - g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;
 - h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and
 - i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

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



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

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

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

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

- (1) The permittee shall collect and maintain monthly records of the following information for the coating operations:
- a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in lbs/gal;
 - d. the VOC emission rate for each coating, in lbs per month $[d)(1)b. \times d)(1)c.]$;
 - e. the VOC emission rate for all coatings employed, in lbs per month, $[\text{summation of } d)(1)d.]$;
 - f. the total annual VOC emission rate for all coatings employed, in tons, summation of $d)(1)e.$
- (2) The permittee shall collect and maintain monthly records of the following information for the cleanup operations:
- a. the name and identification number of each clean-up material employed;
 - b. the number of gallons of each cleanup material employed;



- c. the VOC content of each clean-up material employed, in lbs/gal;
 - d. the VOC emission rate for each cleanup material, in lbs per month [d)(2)b. x d)(2)c.];
 - e. the VOC emission rate for all cleanup materials employed, in lbs per month, [summation of d)(2)d.];
 - f. the total annual VOC emission rate for all cleanup materials employed, in tons, summation of d)(2)e.
- (3) The permittee, having chosen to demonstrate compliance with a limitation based on pounds of VOC per gallon of coating solids, shall collect and record the following information each day for the coating line and control equipment:

- a. the name and identification number of each coating applied;
- b. for each coating, the calculation for the VOC content in pounds of VOC per gallon of coating solids and the record of each variable for each coating applied:

$$C_{VOC,3} = (D_C)(W_{VOC}) / V_S$$

where:

$C_{VOC,3}$ = VOC content, in pounds of VOC per gallon of solids

D_C = density of coating, in pounds of coating per gallon of coating

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

W_{VM} = weight fraction of VOC in coating, in pound of VOC per pound of coating

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

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

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating;

- c. the maximum VOC content per gallon of coating solids for all the coatings applied; or
- d. the daily volume-weighted average VOC content in pounds of VOC per gallon of coating solids of all the coatings applied, calculated as follows:

$$(C_{VOC,3})_A = \frac{\sum_{i=1}^n (C_{VOC,3i}) (L_{Ci}) (V_{Si})}{\sum_{i=1}^n (L_{Ci}) (V_{Si})}$$



where:

$(C_{VOC,3})_A$ = daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied)

$C_{VOC,3}$ = VOC content, in pounds of VOC per gallon of solids

L_C = liquid volume of each coating employed during the day

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating

i = subscript denoting a specific coating employed during the day or averaging period

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during the day or during the averaging period.

- e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the maximum VOC content of any coating applied or the daily volume-weighted average) using the overall control efficiency, as determined for the RTO during the most recent emission test that demonstrated that the emissions unit(s) was/were in compliance.
- (4) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;
 - b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;
 - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
 - d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:
 - i. Method 311 from 40 CFR Part 63, Appendix A;
 - ii. Method 24 from 40 CFR Part 60, Appendix A if all non-aqueous volatile matter is to be used for the mass fraction of HAP;
 - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the



mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

- iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.
- e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

- i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or
- ii. calculated from: $V_s = 1 - m_{\text{volatiles}} / D_{\text{avg}}$

where:

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

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

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

- iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:
 - (a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;



- (b) add the gallons of solids, gallons of water, and gallons of solvent from d)(4)(e)(iii)a.; and
 - (c) divide the gallons of solids, from d)(4)(e)(iii)a. by the sum of the gallons of coating components from d)(4)(e)(iii)b., to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);
- f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$\text{HAP} = \sum_{i=1}^r (\text{VOL}_i) (D_i) (W_i)$$

where:

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

VOL_i is the volume of material “i” documented in d)(4)b. above, in gallons or liters.

D_i is the density of material “i” as documented in d)(4)c. above, in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material “i” as calculated in d)(4)d. above, in pound/pound or kg/kg.

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

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

$$H_{\text{TOT}} = \text{HAP}_c + \text{HAP}_t + \text{HAP}_{\text{cu}} - R_w$$

where:

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



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

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

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(4)f. above, in pound or kg.

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

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

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

where:

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

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

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in d)(4)e. above.

m is the number of coatings applied during the month.

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

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

where:

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



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

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

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

where:

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

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

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

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

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

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

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

where:

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

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



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

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

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

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

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

where:

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

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

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

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

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

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

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



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

where:

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

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

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

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

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

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

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

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

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

where:

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

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in d)(4)g. above.

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



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

$HAP_{contr, b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation “b”, calculated as required in d)(4)i. above.

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

z is the number of coating operations without control.

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

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

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

$HAP_{T,y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(4)j. above, in pound or kg.

$VOL_{s,y}$ is the total volume of coating solids used during month y, calculated in d)(4)h. above, in gallons or liters.

y is the identifier for the month.

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

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

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



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

- (5) The permittee shall also maintain records of the following documentation for all controlled coating operations:
- a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;
 - b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;
 - c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or
 - d. records for establishing the criteria for the temporary total enclosure or building enclosure:
 - i. if using the liquid-to-uncaptured-gas protocol the record shall include:
 - (a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;
 - (b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;
 - (c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and
 - (d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;



- ii. if using the gas-to-gas protocol the record shall include:
 - (a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;
 - (b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and
 - (c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;
- e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;
- f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;
- g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);
- h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;
- i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;
- j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;
- k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and
- l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

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

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact.



Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

- (6) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:
- a. The valve or closure mechanism controlling the bypass line shall be secured in a non-diverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:
 - i. A flow control position indicator shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or
 - ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or
 - iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (non-diverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or
 - iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or



- v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.
 - b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.
- (7) The emission capture system shall be installed, operated and maintained according to the following requirements:
- a. Each flow measurement device shall meet the following requirements:
 - i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.
 - ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.
 - iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.
 - iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.
 - v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.
 - vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.
 - vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.
 - b. Each pressure drop measurement device shall comply with the following requirements:



- i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.
 - ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.
 - iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.
 - iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.
 - v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.
 - vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.
 - vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.
- (8) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:
- a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;
 - b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;
 - c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;
 - d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);



- e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;
- f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;
- g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;
- h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;
- i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;
- j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;
- k. all CMS calibration checks;
- l. all adjustments and maintenance performed on CMS; and
- m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

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

- (9) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:
 - a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
 - b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - c. the date and time identifying each period during which the CMS was out of control;



- d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;
- e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;
- f. the nature and cause of any malfunction (if known);
- g. the corrective action taken or preventive measures adopted;
- h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;
- i. the total process operating time during the reporting period; and
- j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(7)f., d)(7)g., and d)(7)h. as part of the SSMP.

- (10) The acceptable average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.
- (11) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and
 - b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.



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

Whenever the monitored combustion temperature within the RTO deviates from the operating temperature value specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- c. the date and time the deviation began;
- d. the magnitude of the deviation at that time;
- e. the date the investigation was conducted;
- f. the name(s) of the personnel who conducted the investigation; and
- g. the findings and recommendations.

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

- h. a description of the corrective action;
- i. the date corrective action was completed;
- j. the date and time the deviation ended;
- k. the total period of time (in minutes) during which there was a deviation;
- l. the temperature readings immediately after the corrective action was implemented; and
- m. the name(s) of the personnel who performed the work.

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

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



- (12) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (13) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (14) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (15) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (16) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance;



- b. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the RTO;
- c. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where a prompt investigation was not conducted;
- d. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. an identification of each incident of deviation described in e)(1)a. or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s); and
- f. any daily record showing that the waterwash 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.

- (2) The permittee shall notify the Director (The Ohio EPA, Northwest District Office) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.
- (3) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:
 - a. company name and address;
 - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
 - c. the date of the report and the beginning and ending dates of the reporting period;
 - d. identification of the compliance method for each coating operation;
 - e. statement of whether the affected source achieved the emission limitations for the compliance period;



- f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;
- g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
- h. if using the “facility-specific emission limit” alternative according to 40 CFR 63.3890(c)(2), the calculation of the “facility-specific” emission limit for each 12-month compliance period during the 6-month reporting period;
- i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;
- j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and
- k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:
 - i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
 - ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;
 - iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);
 - iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;
 - v. the calculation of the total volume of coating solids used each month, as required in this permit;
 - vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;
 - vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this



- permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;
- viii. the date and time that each malfunction started and stopped;
 - ix. a brief description of the continuous parameter monitoring system (CPMS);
 - x. the date of the latest CPMS certification or audit;
 - xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;
 - xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);
 - xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;
 - xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;
 - xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;
 - xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;
 - xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;
 - xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;
 - xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;



- xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and
 - xxi. a statement of the cause of each deviation.
- (4) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.
- If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:
- a. If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:
 - b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:
 - i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,
 - ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and
 - iii. if any excess emissions and/or parameter monitoring exceedances have occurred.
- (5) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:
- a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or
 - b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.
- (6) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:
- a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;



- b. the explanation of the circumstances of the event;
 - c. the reasons for not following the SSMP;
 - d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and
 - e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.
- (7) The permittee shall submit annual reports that summarize the actual annual VOC emissions from both the coating operations and from the clean-up operations for emissions unit K066. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- f) **Testing Requirements**
- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after start-up.
 - b. The emission testing shall be conducted to demonstrate compliance with the lb VOC/hr emission limitation and 95% VOCdestruction efficiency for the RTO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. For VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - ii. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of



the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the 95% destruction efficiency shall be determined based on the results of emission testing required in f)(1).



b. Emission Limitations:

0.95 lb VOC/hr and 4.16 tons VOC/yr for primer and topcoating operations, combined

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined based on the results of emission testing required in f)(1).

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

* The potential to emit for the primer coating operations for this emissions unit is based on a maximum hourly primer usage of 0.71 gallon per hour multiplied by the maximum solids content of 0.096 gallon solids per gallon of coating, multiplied by the maximum allowed VOC content of 6.7 lbs VOC per gallon of coating solids. The potential to emit for the topcoat coating operations for this emissions unit is based on a maximum hourly primer usage of 0.78 gallons per hour multiplied by the maximum solids content of 0.092 gallon solids per gallon of coating, multiplied by the maximum allowed VOC content of 6.7 lbs VOC per gallon of coating solids.

Compliance with the annual limitation shall be determined by the recordkeeping in section d)(1) of this permit.

c. Emission Limitations:

698 lbs VOC/month and 4.19 tons VOC/yr for clean-up materials

Applicable Compliance Method:

Compliance with the monthly emission limitation above shall be determined by the record keeping in section d)(2) of this permit.

The annual limitation was established by multiplying the monthly VOC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is maintained with the monthly VOC cleanup limitation, compliance with the annual cleanup limitation shall be demonstrated.

d. Emission Limitations:

0.90 lb CO/hr, 3.94 tons CO/yr, for the stack exhaust from the regenerative thermal oxidizer (RTO) for emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, K048, K055, K056, K060, K062, K066, and K067, combined, with an associated RTO minimum operating temperature of 1,508 degrees Fahrenheit



Applicable Compliance Method:

The permittee shall demonstrate compliance with the CO limitation above by multiplying the maximum hourly natural gas combustion rate, in million standard cubic feet per hour, by the appropriate CO emission factor, in pound(s) per million standard cubic feet, from AP-42 Chapter 1.4 (7/98), and then dividing by the maximum heat input to the RTO.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with the requirements specified in Methods 1 through 4 and Method 10, 40 CFR Part 60, Appendix A.

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

e. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the VOC limitation above shall be determined by record keeping in section d)(3) of this permit.

f. Emission Limitations:

Emissions of HAPs shall not exceed 4.5 kg (37.7 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with the HAPs emission limitation above shall be determined by record keeping in section d)(4) of this permit.

g) Miscellaneous Requirements

(1) The permittee shall comply with the requirements of 40 CFR 63.3968 for continuous parameter monitoring system installation, operation, and maintenance requirements for emission capture system(s) as specified in this permit or the following alternatives as approved by USEPA (see 40 CFR 63.3980):

a. Major alternatives to test methods under 40 CFR 63.7(e)(2)(ii) and (f) and as defined in 40 CFR 63.90;



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- b. Major alternatives to monitoring under 40 CFR 63.8(f) and as defined in 40 CFR 63.90;
- c. Major alternatives to recordkeeping and reporting under 49 CFR 63.10(f) and as defined in 40 CFR 63.90.